

EXHIBIT 2



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Transcript of George C. Caruso, CPM, RAM, SHCM, HCCP

Date: December 20, 2016

Case: de Reyes, et al. -v- Waples Mobile Home Park Limited
Partnership, et al.

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Transcript of George C. Caruso, CPM, RAM, SHCM, HCCP

1 (1 to 4)

Conducted on December 20, 2016

	1		3
1	IN THE UNITED STATES DISTRICT COURT	1	A P P E A R A N C E S
2	FOR THE EASTERN DISTRICT OF VIRGINIA	2	ON BEHALF OF THE PLAINTIFFS:
3	ALEXANDRIA DIVISION	3	JOY ODOM, ESQUIRE
4	- - - - - x	4	Quinn Emanuel Urquhart & Sullivan, LLP
5	ROSY GIRON DE REYES, et al.,	5	777 6th Street, Northwest
6	Plaintiffs,	6	11th Floor
7	v.	7	Washington, D.C. 20001
8	WAPLES MOBILE HOME PARK LIMITED	8	202.538.8159
9	PARTNERSHIP, et al.,	9	
10	Defendants.	10	SIMON SANDOVAL-MOSHENBERG, ESQUIRE
11	- - - - - x	11	Legal Aid Justice Center
12	Civil No.: 1:16cv563-TSE-TCB	12	6066 Leesburg Pike
13		13	Suite 520
14		14	Falls Church, Virginia 22041
15	Videoconference Deposition of GEORGE C. CARUSO	15	703.778.3450
16	McLean, Virginia	16	
17	Tuesday, December 20, 2016	17	
18	12:37 p.m.	18	
19		19	
20	Job No.: 131024	20	
21	Pages: 1 - 130	21	
22	Reported by: Lisa Kirk	22	
	2		4
1	Deposition of GEORGE C. CARUSO, held at	1	A P P E A R A N C E S C O N T I N U E D
2	the offices of:	2	ON BEHALF OF THE DEFENDANTS:
3	REED SMITH LLP	3	JUSTIN D. deBETTENCOURT, ESQUIRE
4	7900 Tysons One Place	4	Reed Smith, LLP
5	Suite 500	5	7900 Tysons One Place
6	McLean, Virginia 22102	6	Suite 500
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8		8	703.641.4209
9		9	
10		10	
11		11	
12		12	
13		13	
14		14	
15		15	
16		16	
17		17	
18	Pursuant to Notice, before Lisa Kirk,	18	
19	Court Reporter and Notary Public in and for the	19	
20	Commonwealth of Virginia.	20	
21		21	
22		22	

Transcript of George C. Caruso, CPM, RAM, SHCM, HCCP 2 (5 to 8)

Conducted on December 20, 2016

CONTENTS			5	7
2 EXAMINATION OF GEORGE C. CARUSO		PAGE		
3 By Ms. Odom		6, 121		
4 By Mr. deBettencourt		114		
EXHIBITS				
(Attached to the transcript.)				
11 CARUSO DEPOSITION EXHIBIT		PAGE		
12 Exhibit 1	Expert Report	6		
13				
14				
15				
16				
17				
18				
19				
20				
21				
22				
6 (Caruso Exhibit 1 was marked for identification and is attached to the transcript.)			6	8
3 PROCEEDINGS				
4 MS. ODOM: All right, so Mr. Caruso, we're				
5 going to go ahead and go on the record and the court				
6 reporter is going to swear you in in just a minute.				
7 Your testimony today is as if you were giving it in a				
8 courtroom.				
9 And I just need to ask Mr. deBettencourt if				
10 he agrees that we can stipulate to Mr. Caruso being				
11 sworn remotely.				
12 MR. deBETTENCOURT: Yes.				
13 MS. ODOM: Okay. So the parties are agreed				
14 on that and the court reporter will go ahead and give				
15 you the oath now.				
16 Whereupon,				
17 GEORGE C. CARUSO,				
18 being first duly sworn or affirmed to testify to the				
19 truth, the whole truth, and nothing but the truth,				
20 was examined and testified as follows:				
21 EXAMINATION BY COUNSEL FOR THE PLAINTIFFS				
22 BY MS. ODOM:				

Transcript of George C. Caruso, CPM, RAM, SHCM, HCCP

3 (9 to 12)

Conducted on December 20, 2016

	9		11
1 and we'll work that out.		1 MR. deBETTENCOURT: Objection, form.	
2 A Okay.		2 A No.	
3 Q We can, maybe, fax it to you or we can hold		3 MS. ODOM:	
4 it up to the camera if you need to look at it for		4 Q Go ahead.	
5 any reason. But I saw you've got about 40 years of		5 A I don't do much in the way of day-to-day	
6 experience in managing residential properties; is		6 operations anymore. When there's an issue or an	
7 that right?		7 issue needs to be looked at, I'm the one who goes	
8 A I started in 1972, so, yeah. That would		8 and does it. If we're going to do major capital	
9 be, what, 44 years?		9 work, I'm the one who hires the engineers, hires the	
10 Q That's right, by my calculation. And you		10 contractors, reviews the plans. I'm involved in the	
11 asset manage about 5,000 multifamily units in D.C.		11 annual budgeting processes. I'm involved in the	
12 for --		12 regulatory issues with the regulatory agencies. If	
13 A Yes. Well (inaudible). I am, in theory,		13 we need permits pulled for something, I'm the one	
14 partially retired at this point. The reason I say		14 who goes and pulls the permits. So it's higher	
15 in theory, that's because some weeks I work a full		15 level stuff. I stay out of -- I mean, we have	
16 week, some weeks I don't work at all, but I was		16 full-time management people. And when I retired, I	
17 working full time until April of '14, when I turned		17 retired to let the folks that I spent the last 15	
18 65, and gave up my full-time position. And one of		18 years training replace me and manage. So I do the	
19 my big clients is Mid-City Financial Corporation.		19 higher-end special projects and talk to them from	
20 That's where I do asset management. I also own		20 time to time, but I do not do day-to-day management	
21 properties for my own portfolio.		21 any longer.	
22 Q As part of your asset management for		22 Q Would you say that you're involved in the	
	10		12
1 Mid-City what are some of the responsibilities you		1 creation or upkeep of any of the properties'	
2 have in that job?		2 policies?	
3 A Well, I don't officially have a title. We		3 A In most cases I'm a reviewer of drafts when	
4 just call me the owner's representative, but I sit		4 we change them. There was a time, prior to my	
5 in on budget meetings, operational stuff.		5 retirement, that I was in charge of creating the	
6 Basically, I'm the in-house expert on operations and		6 policies. Now I'm the reviewer of the policies.	
7 property management that they have, and given my		7 Q What types of policies are those?	
8 experience and the fact that I operated their		8 A Across the whole board, the entire policy	
9 portfolio, among others, for 14 years when I was		9 manuals that Edgewood uses, so that would be	
10 working at Edgewood full time. Mid-City Financial		10 policies on admissions, policies on tenant file	
11 Corporation and Edgewood Management Corporation are		11 management, federal regulatory policies, bidding,	
12 owned by the same parent entity, so I will		12 management, contracting, you name it.	
13 occasionally refer to the two interchangeably		13 Q So at some point before your retirement in	
14 because Edgewood is the management operation and		14 2014 you had responsibility for overseeing and	
15 Mid-City is the ownership operation.		15 helping to draft the admissions and tenant policies	
16 Q When you say you're involved in the		16 for the Mid-City properties?	
17 operations, what does that consist of?		17 MR. deBETTENCOURT: Objection, form.	
18 A Anything having to do with the operation of		18 A Actually, my responsibilities were broader	
19 the apartment communities that we own.		19 than that. Mid-City is only one of the components.	
20 Q So is that the day-to-day logistics of		20 Edgewood Management has a substantial book of	
21 keeping the doors open and the grounds kept or is it		21 third-party management and I was the executive vice	
22 something else?		22 president and chief knowledge officer. I was	

Conducted on December 20, 2016

<p>13</p> <p>1 responsible for drafting and enforcing all policies 2 on the entire portfolio, which in those days ran 3 between 165 and 175 properties, around 30,000 units, 4 give or take. Properties are continuously coming in 5 and leaving a portfolio, as you might imagine.</p> <p>6 MS. ODOM:</p> <p>7 Q Where did you first become employed with 8 Mid-City and Edgewood?</p> <p>9 A August of 2002.</p> <p>10 Q And has that been your primary form of 11 employment since 2002 up until your point of 12 retirement?</p> <p>13 A That is my primary compensated form of 14 employment. Myself and my sisters are the 15 beneficiaries of and I am the manager of a series of 16 family trusts, where we manage our own family assets 17 that come from my parents and my grandparents.</p> <p>18 Q Do those assets include residential 19 properties for rent or lease?</p> <p>20 A They do. They include single-family 21 residential properties for rent and lease, and they 22 also include a major agricultural operation.</p>	<p>15</p> <p>1 20,000 units. And then I went to Alco Properties in 2 Memphis. I had a shade more than 8,000 units there. 3 We owned virtually everything we managed. Then I 4 had my mid-career sabbatical as executive director 5 of the National Affordable Housing Management 6 Association, was there for six years in Washington 7 doing lobbying and policy work, and then went to 8 work for Edgewood in 2002. So over those 40 years 9 I've managed everything from high-end luxuries down 10 to assisted properties and pretty much everything in 11 between. There was one point in the mid '80s where 12 I managed the largest single-use residential rental 13 building in the world, which is Lake Point Tower in 14 Chicago. I also managed the largest assisted 15 property in Huron, South Dakota at a whopping -- I 16 still remember the number -- 23 units.</p> <p>17 Q When you did lobbying and policy work in 18 Washington, D.C., what was the topic or focus of 19 that work?</p> <p>20 A I was the executive director of the 21 National Affordable Housing Management Association. 22 It's a real estate trade organization, still exists</p>
<p>14</p> <p>1 Q How many different residential complexes 2 would you say you've managed over your career?</p> <p>3 A Without a lot of research it would be 4 difficult to say, but the number is very substantial 5 at this point. The reason I say that -- and I'll 6 just walk you quickly forward from the major 7 positions once I became an operational vice 8 president. I started in the business in Chicago. I 9 was at Harbor Realty and Management, which is an old 10 Chicago management firm. We managed a large 11 portfolio of properties on Lake Shore Drive. Then I 12 moved to the West Coast and went to work for 13 American Diversified, American Diversified Capital 14 Corporation. That's the largest corporation I've 15 ever worked for. They had -- during the period of 16 time I was there we had a shade more than 55,000 17 units in about 300 locations. After that I moved to 18 The Mitchell Company in Mobile, Alabama. We 19 operated principally in seven states in the 20 southeast, plus Louisiana and Texas. We were a 21 merchant builder, so the portfolio varied, but in 22 most cases it was somewhere in the range from 15 to</p>	<p>16</p> <p>1 today. We worked with HUD, the Department of 2 Agriculture, the Department of Treasury, Congress, 3 and various administrations on a broad range of 4 affordable housing issues, taxation issues, and all 5 the sorts of things that one does if one is running 6 a real estate trade association.</p> <p>7 Q Did any of your lobbying or policy work 8 involve the issue of undocumented immigrants in 9 housing?</p> <p>10 A It certainly did.</p> <p>11 Q In what way?</p> <p>12 A When the late Representative Henry Hyde and 13 the now retired, but still alive, Representative 14 Elton Gallegly introduced the first citizenship 15 requirement bills in the early 1990s, we worked with 16 folks and lobbied. We weren't terribly in favor of 17 them, but Representative Hyde was not going to be 18 deterred.</p> <p>19 Q You and your organization --</p> <p>20 A And he had the votes.</p> <p>21 Q I'm sorry, I didn't mean to interrupt you. 22 And your organization, you said, were not terribly</p>

Transcript of George C. Caruso, CPM, RAM, SHCM, HCCP

5 (17 to 20)

Conducted on December 20, 2016

<p>1 in favor of residency verification requirements?</p> <p>2 MR. deBETTENCOURT: Objection,</p> <p>3 mischaracterize.</p> <p>4 A We weren't necessarily in favor of the</p> <p>5 legislation as written, particularly the parts that</p> <p>6 would penalize owners if someone presented us with</p> <p>7 fraudulent documents. We were not against the</p> <p>8 residency requirements, per se. What we were</p> <p>9 against was owners being held responsible for things</p> <p>10 that they didn't have control over producing, and we</p> <p>11 were deeply concerned that we have better ability to</p> <p>12 verify documents.</p> <p>13 MS. ODOM:</p> <p>14 Q What is affordable housing?</p> <p>15 MR. deBETTENCOURT: Objection, form.</p> <p>16 A Depending on who you are and what your</p> <p>17 income level is, that's a very flexible definition.</p> <p>18 Can you help me out with a little bit more</p> <p>19 specificity?</p> <p>20 MS. ODOM:</p> <p>21 Q Sure. In the context of your lobbying and</p> <p>22 policy work in D.C. you said it related to</p>	<p>17</p> <p>1 operate the housing. And then, finally, in the deep</p> <p>2 assistance sector, there's annual appropriations to</p> <p>3 help support some of the costs of the</p> <p>4 deeply-assisted portfolio.</p> <p>5 Q Can you give me an estimate of, roughly,</p> <p>6 what percentage of the properties you've managed</p> <p>7 received federal funding or subsidy?</p> <p>8 A Not without sitting down with portfolio</p> <p>9 lists and research. Typically, in the period I was</p> <p>10 with Edgewood, about 60 percent of our portfolio was</p> <p>11 assisted and about 40 percent was not.</p> <p>12 Q Are the operations for assisted residential</p> <p>13 housing as opposed to non-assisted any different or</p> <p>14 do they operate the same way?</p> <p>15 A They operate in similar ways. If you're</p> <p>16 using federal or state money, federal or state money</p> <p>17 comes with strings and it comes with rules, so you</p> <p>18 have more reporting and more regulations that you</p> <p>19 have to deal with. The nature of the operation is</p> <p>20 basically similar in both cases.</p> <p>21 Q What are some of those strings that an</p> <p>22 assisted entity would have to deal with?</p>
<p>1 affordable housing, and I wondered what, from your</p> <p>2 perspective, that covered.</p> <p>3 A It's principally all housing types that are</p> <p>4 aimed at housing people at or below, roughly, 60</p> <p>5 percent of area median income.</p> <p>6 Q Did any of your policy or lobbying work</p> <p>7 relate to federal subsidies or financing for low</p> <p>8 income --</p> <p>9 A Yes.</p> <p>10 Q -- tenants?</p> <p>11 A Yes.</p> <p>12 Q In what way?</p> <p>13 A Well, much of the affordable housing stock</p> <p>14 in this country is underpinned by FHA mortgages.</p> <p>15 You know who FHA is. You know it's a federal</p> <p>16 division. They're also underpinned by Freddie and</p> <p>17 Fannie financing, and to some extent Freddie Mac</p> <p>18 financing, so we worked with all those groups in</p> <p>19 terms of financing. And, of course, if you're in</p> <p>20 the affordable housing business, you have an</p> <p>21 inherent interest in the rulemaking and rules that</p> <p>22 HUD is proposing adopting that will impact how you</p>	<p>18</p> <p>20</p> <p>1 A That's a very broad topic and we can spend</p> <p>2 days on it.</p> <p>3 Q Well, let's --</p> <p>4 A There is literally -- there's literally a</p> <p>5 three-foot long section of the Code of Federal</p> <p>6 Regulations called 24 CFR, chapter 24. It occupies</p> <p>7 a bookshelf about that long (indicating).</p> <p>8 THE WITNESS: For the recorder, I'm holding</p> <p>9 my hands about three feet apart.</p> <p>10 A And if you've been in this business as long</p> <p>11 as I have, you've been inside those regulations for</p> <p>12 years. And as I said, if they're writing you a</p> <p>13 check, they have all kinds of regulations that you</p> <p>14 have to comply with.</p> <p>15 MS. ODOM:</p> <p>16 Q Understood.</p> <p>17 A (Inaudible.)</p> <p>18 (At which time the court reporter requested</p> <p>19 clarification regarding the answer.)</p> <p>20 A If they're either writing you a check to</p> <p>21 cover the cost of operations or they're writing --</p> <p>22 or they have written you a mortgage, you get with</p>

Conducted on December 20, 2016

	21		23
1 that regulations that you have to comply with.		1 A Yup, because for Fair Housing reasons you	
2 Q So we'll come back with some specificity		2 want to operate consistently. Otherwise, the FH&EO	
3 later. I don't want to spend days on the		3 Division of HUD will be on you. And if you manage	
4 regulations and strings that may be attached to		4 what I call a split company, which means you're	
5 federal funding or subsidies, but I did want to get		5 doing both conventional and assisted or affordable	
6 a sense of whether any of the properties that you've		6 management, you need to adopt one set of policies	
7 managed over the years have included mobile home		7 and maintain them consistently.	
8 properties or whether it's only been apartments?		8 Q Is the ratio of assisted to non-assisted	
9 MR. deBETTENCOURT: Objection.		9 entities -- you said a moment ago it was about 60	
10 A I have been --		10 percent received federal funding and about 40	
11 THE WITNESS: Go ahead. I'm sorry.		11 percent didn't. Does that ratio hold true from the	
12 MR. deBETTENCOURT: Objection, form.		12 1990s to the present or is it different?	
13 MS. ODOM:		13 A Without sitting down with the specific	
14 Q You can go ahead and answer.		14 property lists, I wouldn't be able to tell you.	
15 A The short answer is I have done residential		15 Q Are you able to tell me whether entities	
16 rental and residential condominiums most of my		16 that don't receive federal or state housing subsidy	
17 career. I have done a smattering -- and I use that		17 or funding also have a policy like the one in this	
18 term very carefully -- a smattering of commercial		18 case?	
19 and retail spaces. I have not operated mobile home		19 MR. deBETTENCOURT: Objection, form.	
20 parks directly.		20 A Some of my colleagues in this business that	
21 Q For the properties that you have helped		21 are not doing deep assistance work have adopted very	
22 manage in some capacity over the years, did they all		22 similar policies, yes.	
	22		24
1 have a policy excluding undocumented immigrants from		1 MS. ODOM:	
2 tenancy?		2 Q But not all?	
3 MR. deBETTENCOURT: Objection, form.		3 A I have to tell you I don't go around asking	
4 A I think there you have to be careful to		4 everybody that when I talk to them.	
5 specify when. The legislation that relates to that		5 Q But from your personal experience and	
6 didn't come into play until the early 1990s. It		6 knowledge, are you able to say whether the	
7 wasn't an issue until the early 1990s. So in the		7 properties that you've had some involvement in all	
8 early stages of my career it wasn't an issue because		8 have a policy that exclude undocumented immigrants	
9 nobody seemed to care. When Congress passed a		9 from tenancy whether or not they receive federal	
10 series of bills and legislation related to it in the		10 funding?	
11 early and middle '90s, and then visited those bills		11 MR. deBETTENCOURT: Objection, form, asked	
12 again in the late '90s, it moved from being not on		12 and answered.	
13 your agenda to being on your agenda.		13 MS. ODOM:	
14 MS. ODOM:		14 Q You can go ahead and answer.	
15 Q So let's take the question from after		15 A I think I would stay with what I said	
16 Congress passed that legislation in the early '90s		16 earlier, and that is for the most part, yes, but	
17 forward. For the properties that you've assisted in		17 without specifically looking at a property list and	
18 managing since the 1990s to the present, has each of		18 looking at whether owners had a special set of	
19 those properties had a policy like the one at issue		19 requirements, which some of them do, I can't tell	
20 in this case?		20 you with 100 percent certainty that every property	
21 A Very similar to it, yes.		21 did. I can tell you that virtually everything we	
22 Q Every single property?		22 had in the portfolio did.	

Transcript of George C. Caruso, CPM, RAM, SHCM, HCCP

7 (25 to 28)

Conducted on December 20, 2016

1 Q Do you know whether the Waples Mobile Home 2 Park received any form of federal or state housing 3 finance or subsidy? 4 A I'm unaware of their situation. 5 Q Would that be an important piece of 6 information for you to know in order to determine 7 whether the policy at issue in this case was 8 necessary? 9 A No, I don't think so. 10 Q Why not? 11 A When this legislation came into place, it 12 was clear that the intent of Congress was to ensure 13 that folks in residency should be in this country 14 appropriately. In addition, at the same time, and 15 this is exceedingly important, as you know, laws 16 were enacted that employers are to ascertain the 17 legality of all employees. And if you don't know 18 the status of somebody, you can't underwrite them, 19 because if you have somebody that doesn't have 20 status, that means, by definition, they're not 21 working legally. It's difficult to underwrite it. 22 Q So we'll get to the employment verification	25 1 speculation. 2 MS. ODOM: 3 Q You can go ahead and answer if you 4 understand the question. If not, I can restate it. 5 A I think you better try and nail it down a 6 little bit, because the other thing you're doing 7 here is trying to divorce employment from leasing 8 activities, and you can't, because you're 9 underwriting against employment. 10 Q Well, I think I'd like to take it in two 11 pieces, so I understand your opinion that for 12 underwriting employment verification is important, 13 but I also understand your report to be offering a 14 second opinion, which is that in order for a 15 landlord to become eligible for federal or state 16 housing funding, they must verify that all tenants 17 are present in the United States legally. Do I have 18 your opinions correct? 19 MR. deBETTENCOURT: Objection, form. 20 A Yes, you have my views right on that. You 21 have to – in order to qualify for subsidy money 22 from the federal or state agencies, you have to be	27
26 1 part of your opinions in a second, but I want to 2 finish up with you on the federal funding aspect 3 first. You said when Congress passed the 4 legislation in the early 1990s, it was clear their 5 intent was that landlords verify the residency of 6 their tenants, the legal status of their tenants. 7 A Yes. Yeah. 8 MR. deBETTENCOURT: Objection, form. 9 MS. ODOM: 10 Q So my question for you is do you believe 11 that's true whether or not a particular landlord 12 receives federal or state subsidies for housing? 13 MR. DeBETTENCOURT: Objection, form. 14 A I'm not sure I understand precisely what 15 you're trying to get at. 16 MS. ODOM: 17 Q All right. I'll rephrase it. Is it your 18 opinion that the Congressional intent for what a 19 landlord has to verify about a prospective tenant, 20 is that the same whether or not that landlord is 21 receiving any type of government funding? 22 MR. deBETTENCOURT: Objection, form,	28 1 in the country legally. 2 MS. ODOM: 3 Q Okay. So my question is if a landlord is 4 not applying for any subsidies and is not receiving 5 any sort of government funding, do they still have 6 to verify the presence of a tenant, that that tenant 7 is in the United States legally? If you take 8 funding out of it, what does the government got left 9 to say to you? 10 MR. deBETTENCOURT: Objection, form. 11 A The government's still got left to say to 12 you you still have to underwrite it, so you run 13 around that issue. And, two, if you're running what 14 I'll call a mixed company, which means you're 15 running a management house that does both types of 16 management, you can't have an inconsistent set of 17 standards. Fair Housing will get on you about that. 18 So most of us that run mixed companies, we have one 19 set of standards whether the property is subsidized 20 or not. And we adopt the most restrictive standard, 21 which is the federal standard. 22 MS. ODOM:	28

Transcript of George C. Caruso, CPM, RAM, SHCM, HCCP
Conducted on December 20, 2016

29

1 Q Would you agree with me that the
2 underwriting of a lease is a more local focus for a
3 landlord? That is to say, that's something that the
4 landlord is concerned about, the risk of that lease,
5 and nobody else but the landlord is concerned about
6 that? Would you agree that's a fair statement?

7 MR. deBETTENCOURT: Objection, form.

8 A I'm trying to understand what you're trying
9 to get at.

10 MS. ODOM:

11 Q Sure. Is the government concerned about
12 the proper underwriting by a landlord of a
13 prospective tenant's lease?

14 MR. deBETTENCOURT: Objection, speculation.

15 A There will be instances where they would be
16 concerned, where you've got money borrowed from an
17 agency that's either insured by or cuts mortgages
18 on, because they want to make sure that the terms of
19 the loan are being met, most particularly that the
20 loan is getting paid. Now, that's a roundabout way
21 of getting to it, but you have to look at both
22 elements. You've got the financing element if

31

1 landlord's underwriting of a lease; is that fair?

2 MR. deBETTENCOURT: Objection, form.

3 A There's one limited circumstance where they
4 would be concerned with the underwriting of the
5 lease. If it -- if someone filed a complaint that
6 they were being treated disparately from other
7 applicants, in other words, file a Fair Housing
8 complaint, the government can come in and take a
9 look at how you do your underwriting, how you do
10 your admissions, and whether you're consistent in
11 the application of the rules. I've had Fair Housing
12 inquiries look at those. They literally come in,
13 sit down, and go through the resident files.

14 MS. ODOM:

15 Q But in the absence of such a complaint, the
16 landlord's underwriting is the landlord's business;
17 is that right?

18 MR. deBETTENCOURT: Objection, form.

19 A Yeah.

20 MS. ODOM:

21 Q Is Waples Mobile Home Park in the
22 low-income housing business?

30

1 you've got somebody in the equation that's got, you
2 know, government-related or government-insured
3 financing, and then you have the operational
4 element.

5 MS. ODOM:

6 Q Okay. If we have no loan, if there's no
7 government loan or agency loan in the picture, is
8 the government concerned --

9 A Right.

10 Q -- about the quality of a landlord's
11 underwriting of a lease?

12 MR. deBETTENCOURT: Same objection.

13 A No, but the landlord would be.

14 MS. ODOM:

15 Q And only the landlord, correct?

16 A So it would seem.

17 Q So, really, there is -- there are two
18 pieces of your opinion. And I understand that you
19 want to take them in whole, but we have the federal
20 funding and subsidy part of your opinion, and then
21 we have the underwriting portion. And the
22 government doesn't concern itself with the

32

1 A Counsel hasn't shared with me precisely
2 what the target market is on that, so I'm not in a
3 position to really opine on that.

4 Q Would you have wanted to receive that
5 information for your opinions?

6 MR. deBETTENCOURT: Objection. To the extent
7 this question calls for communications from counsel,
8 I'm going to instruct you to answer -- instruct you
9 not to answer.

10 MS. ODOM:

11 Q And just to be clear, I'm not asking you
12 for anything that counsel at Reed Smith has told
13 you. I'm simply asking if you had all the
14 information available to you that you would have
15 wanted to have in an ideal world?

16 MR. deBETTENCOURT: Objection, form.

17 A As the folks at Reed Smith --

18 THE WITNESS: Go ahead.

19 A As the folks at Reed Smith have indicated,
20 the only conversations I've had have been with the
21 lawyers.

22 MS. ODOM:

Transcript of George C. Caruso, CPM, RAM, SHCM, HCCP

9 (33 to 36)

Conducted on December 20, 2016

<p style="text-align: right;">33</p> <p>1 Q Did you ever request any other documents or 2 information than were provided to you?</p> <p>3 MR. deBETTENCOURT: Objection, privileged 4 information. To the extent this question calls for 5 communications between you and counsel, I'm going to 6 instruct you not to answer.</p> <p>7 MS. ODOM:</p> <p>8 Q Are you able to answer, Mr. Caruso?</p> <p>9 MR. deBETTENCOURT: I'm instructing you not 10 to answer, Mr. Caruso.</p> <p>11 MS. ODOM:</p> <p>12 Q Well, let me ask you this. Did you rely on 13 any materials besides your own experience in 14 creating your report and forming your opinions?</p> <p>15 A No. Largely, my opinions were -- I was 16 asked to render my views as to how one might go 17 about operating this, in the abstract and that's 18 what I've done.</p> <p>19 Q So to be clear, for example, you didn't 20 review any of the documents that were produced in 21 this case?</p> <p>22 MR. deBETTENCOURT: Objection, form.</p>	<p style="text-align: right;">35</p> <p>1 I think there's two pages that follow that label</p> <p>2 Exhibit A.</p> <p>3 Q That's right. So I just want to be clear, 4 that's the only document in this case that you've 5 reviewed; is that right?</p> <p>6 A Yup.</p> <p>7 Q And to make sure the record is clear on 8 this, you are following Counsel's instruction not to 9 answer whether you asked for any other documents to 10 review?</p> <p>11 MR. deBETTENCOURT: Objection, asked and 12 answered, privileged information.</p> <p>13 I'm instructing you not to answer.</p> <p>14 MS. ODOM: I'm simply asking the witness to 15 state for the record whether he's following Counsel's 16 instruction not to answer whether he asked for any 17 other documents. That does not call for privileged 18 information.</p> <p>19 MR. DeBETTENCOURT: You can answer that 20 question.</p> <p>21 MS. ODOM:</p> <p>22 Q Would you like me to restate it,</p>
<p style="text-align: right;">34</p> <p>1 A The only document I've seen related to this 2 case is my -- and you're going to have to help me 3 with the name of the document -- the document my 4 opinion was put in. What's that?</p> <p>5 MS. ODOM:</p> <p>6 Q Your expert report?</p> <p>7 A But it had a header on it. I don't 8 remember what the header said.</p> <p>9 Q Yup, it's got a caption on it. I'm not 10 sure -- where is the camera located? You probably 11 can't see. I'll walk it over to you, so you can 12 see.</p> <p>13 A No, I can't.</p> <p>14 Q All right, so --</p> <p>15 A My eyesight is not that good.</p> <p>16 Q Let me -- all right, are you able to see 17 that, Mr. Caruso?</p> <p>18 MS. ODOM: For the record, I'm holding up 19 what's been marked as Exhibit 1, which is 20 Mr. Caruso's report.</p> <p>21 Q Does that look --</p> <p>22 A Yeah, there's -- that's the header page and</p>	<p style="text-align: right;">36</p> <p>1 Mr. Caruso?</p> <p>2 A Yeah, that would be helpful.</p> <p>3 Q Sure. No problem. So I was just asking 4 you to confirm for the record that you're following 5 Counsel's instruction not to answer as to whether 6 you asked to see any other documents in this case.</p> <p>7 A I am following Counsel's instruction.</p> <p>8 Q Have you ever come into contact or become 9 aware of undocumented immigrants at the Mid-City and 10 Edgewood properties?</p> <p>11 MR. deBETTENCOURT: Objection, form.</p> <p>12 A Yes.</p> <p>13 MS. ODOM:</p> <p>14 Q How many times?</p> <p>15 MR. deBETTENCOURT: Same objection.</p> <p>16 A I can't give you a precise number, and only 17 very occasionally. And I would only see it after an 18 issue had revealed itself and we were in the process 19 of removing those folks from residence.</p> <p>20 MS. ODOM:</p> <p>21 Q Would it be less than ten times?</p> <p>22 A I can't give you a precise number, but it's</p>

Transcript of George C. Caruso, CPM, RAM, SHCM, HCCP

10 (37 to 40)

Conducted on December 20, 2016

37

39

1 probably less than -- less than a couple cases a
2 year.

3 Q Since 2002?

4 A Yeah.

5 Q Let's take the most recent case. What was
6 the circumstance in which that situation revealed
7 itself to you?

8 MR. deBETTENCOURT: Objection, form.

9 A The last case I recall, we, in the process
10 of reacting to a visit -- I use that term
11 advisably -- by the U.S. Attorneys for the District
12 of Columbia to do -- perform an arrest in an
13 apartment, it became revealed that some of the
14 documents that had been provided to us were
15 forgeries, and we ultimately ended up removing those
16 people. One of the people had already been arrested
17 and we ended up removing the household as a
18 consequence of it because they gave us forged
19 documents.

20 MS. ODOM:

21 Q Did the forged documents include a Social
22 Security card?

1 emerged that his income was fraudulently
2 understated, and he was current on what we thought
3 he was making.

4 Q Is it possible for a citizen or

5 fully-documented immigrant to fraudulently
6 underestimate their income on a lease application?

7 A Yes.

8 Q Can you tell me some of the residential
9 landlords in northern Virginia and D.C. that you
10 consider to be well-managed?

11 A Well, clearly, I would consider my firm to
12 be well-managed.

13 Q Aside from your own?

14 A Huh?

15 Q Aside from your own, are there any that you
16 can think of?

17 A I have colleagues that post properties. I
18 consider their stuff to be very well-managed. I
19 have colleagues at Equity Residential. I consider
20 their stuff to be very well-managed. I have friends
21 at PRD. I consider their stuff to be very
22 well-managed. I have some friends at Aimco. I

38

40

1 A I can't remember with precision what all in
2 the jacket was forged, but there were forgeries in
3 the file.

4 Q Did these tenants that we're speaking about
5 cause any disturbance at the property or was the
6 legal issue one that had arisen outside the confines
7 of the property?

8 MR. deBETTENCOURT: Objection, form.

9 A As I recall, and it's a little fuzzy, one
10 of the tenants was picked up on a drug offense, and
11 I don't remember whether the offense was on the
12 property or abutting it.

13 MS. ODOM:

14 Q Did Mid-City receive any complaints from
15 other tenants about this individual?

16 A I don't recall my staff mentioning anything
17 to me. Obviously, when somebody raids one of your
18 properties, you know about it, and a lot of
19 residents get very concerned.

20 Q Had this tenant been current on his rent
21 payments?

22 A To the best of my knowledge, yes, but it

1 consider their stuff to be well-managed. I can go
2 on. I have a lot of friends, but I know a number of
3 firms that are well-managed in the District and in
4 northern Virginia, and in Maryland, and the other
5 places where they operate.

6 Q Do each of the properties that you just
7 mentioned have a policy similar to Waples that
8 excludes undocumented immigrants from tenancy?

9 MR. deBETTENCOURT: Objection, form.

10 A I haven't done specific polling with them,
11 but to the extent that those firms I just mentioned
12 have deep assistance jobs, they obviously do,
13 because they comply with the rules just like we do.

14 MS. ODOM:

15 Q How do you know that?

16 A Because if you want to be in the deep
17 assistance management business, HUD can lift your
18 authority to manage if you're not managing correctly
19 and not complying with the rules.

20 Q So the threat of regulatory intervention,
21 you believe, is an incentive to have a policy like
22 this?

Transcript of George C. Caruso, CPM, RAM, SHCM, HCCP

11 (41 to 44)

Conducted on December 20, 2016

	41		43
1 A Well, that's one of the incentives. The 2 threat of civil money penalties against you as an 3 individual or an executive of the firm is another, 4 and there's a whole string of other things that -- 5 I've been a senior executive for many years and I've 6 had to sign a lot of management certifications and a 7 lot of contracts and a lot of other documents, and 8 the term we use inside the house is -- whenever I 9 sign them, one of my subordinates comes in, I say to 10 them, looking at them like I'm looking at you, okay, 11 I'm betting my career here, is everything right.		1 A Not knowing precisely how they lease their 2 lots, I can't answer that. I've never seen a lot 3 lease. I don't know what their restrictions are or 4 are not. I don't know how they structure their 5 deals.	
12 Q So what about landlords or residential 13 property management companies that aren't in the 14 deep assistance business, as you've called it? Do 15 they have the same fear of regulatory intervention 16 and civil monetary penalties?		6 MS. ODOM:	
17 A Without -- you're going to need to narrow 18 that question and you're going to need to either 19 include or exclude mortgage financing from that.		7 Q Do you think that's information that would 8 be relevant to the opinions in your report?	
20 Q All right, let's exclude mortgage financing 21 and --		9 A Not particularly, no. If you're going to 10 comply with the Fair Housing rules and you're going 11 to operate in what I regard as a fully-professional 12 manner, the nature of the financing package on the 13 item sitting on the ground lease is not necessarily 14 all that relevant.	
22 A Meaning you don't have any mortgage money	42	15 (At which time the court reporter requested 16 clarification regarding the answer.)	
1 from any federal or state agency?		17 Q Except to the extent that it may imbue some 18 regulatory risk on the landlord; is that right?	
2 Q To the landlord. So to the extent --		19 MR. deBETTENCOURT: Objection, form.	
3 A Right.		20 A Again, not having seen the documents and 21 not knowing how they do the ground lease, I don't	
4 Q -- a tenant has received a mortgage, that's 5 a private mortgage between the tenant and the 6 mortgagor.		22 know.	
7 A Right, but a tenant with a mortgage 8 wouldn't be living in a rental property, I wouldn't 9 think.			44
10 Q Well, are you familiar with the way that 11 the Waples' leases work?		1 MS. ODOM:	
12 A You mean -- you're talking specifically -- 13 you're going to have to narrow that down for me. I 14 think you're talking about where -- in a mobile home 15 community you're essentially engaging in a ground 16 lease. And the item -- just like you would in a 17 commercial situation, and the item sitting on top of 18 it can be separately mortgaged. Is that the 19 differentiation you're making?		2 Q Well, to get us back to how we got down 3 this path, what we were discussing is whether a 4 community like Waples is the same as one like Aimco 5 or Mid-City or Edgewood, that's what you've called a 6 deep assistance management group.	
20 Q Well, is that your understanding of the way 21 the Waples community operates?		7 A Mm-hmm.	
22 MR. deBETTENCOURT: Objection, form.		8 MR. deBETTENCOURT: Objection, 9 mischaracterize.	
		10 MS. ODOM:	
		11 Q And my question for you in the beginning 12 was whether Waples is differently situated from 13 those entities? Is it your opinion that Waples is 14 situated the same as an entity like Mid-City?	
		15 MR. deBETTENCOURT: Objection, form.	
		16 A If you're asking me -- if you're asking me 17 whether I would operate them differently than I 18 operate other stuff, I maintain a consistent 19 approach and recommend to my folks that they 20 maintain a consistent approach, and that is we do 21 the same thing the same way everywhere.	
		22 MS. ODOM:	

Conducted on December 20, 2016

	45		47
1 Q	And that's because of the Fair Housing	1 government funding in the way that we've been	
2 rules?		2 talking about.	
3 A	(No verbal response.)	3 A	Mm-hmm.
4 Q	But you also mentioned that you are -- I	4 Q	Using that assumption, does Waples have
5 say you, meaning Mid-City and Edgewood, are what you		5 less of a regulatory risk or concern than an entity	
6 phrased as a deep assistance manager?		6 like Mid-City?	
7 A	Mm-hmm.	7 MR. deBETTENCOURT: Objection, form.	
8 Q	Can you explain for me what that means?	8 MS. ODOM:	
9 MR. deBETTENCOURT:	Objection, form.	9 Q	You can answer.
10 MS. ODOM:		10 A	One more time, not knowing how the upper
11 Q	You can go ahead and answer.	11 tiers look, and what other assets, or inside Waples	
12 A	A deep assistance situation is where some	12 ownership entity going up, these deals tend to be	
13 subdivision of either a state -- the state or		13 very complexly structured, as I've said before, and	
14 federal government is writing a check on a monthly		14 I'll keep saying it, I always felt it necessary to	
15 basis to cover part of the costs of the operation of		15 follow Congressional intent, maintaining a	
16 the community. So deep assistance is a situation		16 consistent policy whether or not there's federal	
17 where the tenant payment is not 100 percent of the		17 funding present. Doing it one way and doing it that	
18 cost of operating a community.		18 way consistently inside the context of the rules has	
19 Q	And because an entity like Aimco or	19 always been how I've operated.	
20 Mid-City or Edgewood is receiving that check to		20 Q	So you said something a second ago I want
21 cover their costs --		21 to go back to. You said these things are structured	
22 A	Mm-hmm.	22 in a complex way. My question is if an entity has a	
	46		48
1 Q	-- of operation, that generates a	1 managing entity, and then it may have several	
2 regulatory risk from HUD; is that correct?		2 different properties beneath that umbrella --	
3 MR. deBETTENCOURT:	Objection, form.	3 A	Mm-hmm.
4 A	In point of fact, you sign a document	4 Q	-- is something that happens at one
5 called a Regulatory Agreement in order to get the		5 property, in terms of deep assistance, relevant to	
6 payments, so, yes, you have a contractual		6 what happens at a different property that doesn't	
7 arrangement with the federal government or with the		7 receive deep assistance?	
8 state agency.		8 MR. deBETTENCOURT: Objection, form.	
9 MS. ODOM:		9 A	There's a term of art that HUD uses called
10 Q	And that contractual agreement is part of	10 misallocation of assets and equity skimming. And if	
11 the motivation to ensure that the policies at that		11 you're doing something one place that you shouldn't	
12 residential complex comply in all ways with federal		12 be doing the other, and it impacts where money is	
13 requirements?		13 going, yes, it can involve it.	
14 MR. deBETTENCOURT:	Objection, form.	14 MS. ODOM:	
15 A	That is correct.	15 Q	Okay. But assuming there's no
16 MS. ODOM:		16 misallocation of funds in the way that you	
17 Q	So my question for you is whether Waples	17 described, that one complex of units receives	
18 receives deep assistance, whether it receives any		18 federal funding and one complex of units does not,	
19 check from the government?		19 even though they're managed under the same umbrella,	
20 A	I can't answer that. I don't know.	20 is the fact that one of those entities receives	
21 Q	So I'd like you to assume that the answer	21 federal funding relevant at all to the policies of	
22 is no, that Waples doesn't receive any sort of		22 the non-funded entity?	

Transcript of George C. Caruso, CPM, RAM, SHCM, HCCP

13 (49 to 52)

Conducted on December 20, 2016

	49		51
1		1	they are required to provide with their application
2	MR. deBETTENCOURT: Same objection.	2	at Waples?
3	A To the extent it can get you in a suit with	3	A I've not seen the list. I don't know.
4	FH&EO if there was a Fair Housing complaint, yes,	4	Q Do you know the defendants in that --
5	because, again, they come in and the first thing	5	A Can you guys do me a favor a second?
6	they look for is is your pattern and practice	6	Q Sure.
7	consistent, do you do the same thing in the same way	7	A Could you kill the microphone that's down
8	everywhere, and is everyone required to meet the	8	by that keyboard? It's making me crazy.
9	same rules.	9	Q It is off, but --
10	MS. ODOM:	10	A Thank you.
11	Q Are you aware of what requirements a	11	Q You know what, I'm so sorry, Mr. Caruso, I
12	prospective tenant must meet at the Waples Mobile	12	12 don't think we're able to mute this one, but we're
13	Home Park in order to be accepted as a tenant?	13	13 going to move it so that you don't have to listen to
14	A I have not seen their tenant selection plan	14	14 it.
15	and their policies on an individual basis.	15	A That's good.
16	Q Are you able to describe the policy that's	16	Q This may make me extra loud, a downside.
17	being challenged in this case?	17	17 And I meant to say this at --
18	A I think you could probably describe it much	18	A Yeah, because all I'm hearing is this
19	better than I could.	19	clickety, clickety, clickety, click, and it just --
20	Q Well, I'd like for you to take a crack at	20	I know you gotta make notes. I get that part. I
21	it for me. Are you able to describe the policy	21	just...
22	A As I understand it, the key question here	22	Q Anything we can do. And I meant to say
	50		52
1	is the owners and operators of Waples are being	1	this at the outset, but if you get where you'd like
2	challenged over their requirement that everyone that	2	2 to take a break, just let me know and we'll take
3	is an adult leaseholder has to be in this country	3	3 one.
4	legally. Now, whether that means they are a citizen	4	A I'll raise my hand just like you do in
5	or resident alien or some other form of legal	5	5 first grade (indicating).
6	residence in the country, they have to be here	6	Q A-plus, there you go.
7	legally.	7	A Okay.
8	Q Do you know what documents the Waples'	8	Q All right. Do you know what the
9	policy requires a prospective tenant to provide?	9	9 defendants' reasons are for having this policy? And
10	A I have not seen a complete list of the	10	10 when I say defendants, I mean the A.J. Dwoskin
11	documents that they have to provide. And depending	11	11 company and Waples Mobile Home Park.
12	on one's situation, that document list is going to	12	A I think it's a general proposition, they
13	be widely variable.	13	want to make sure when they're underwriting folks,
14	Q You said you hadn't seen a complete list.	14	14 that they have a reasonable assurance that the rent
15	Have you seen a partial list?	15	15 is going to get paid. And in order to have a
16	A My understanding, and it's only oral, is	16	16 reasonable assurance the rent is going to get paid,
17	that they have to be here legally. I don't know how	17	17 that generally means somebody is going to have to
18	exactly that lays out in the policy and tenant	18	18 have a job. And we've been around that bush
19	selection plan. I've not seen the tenant selection	19	19 already. And, again, you know, as we've said
20	plan.	20	20 before --
21	Q For a prospective tenant that does not have	21	MR. deBETTENCOURT: Mr. Caruso --
22	a Social Security number, do you know what documents	22	A -- package of things --

Conducted on December 20, 2016

	53		55
1	MR. DeBETTENCOURT: -- sorry to interrupt.	1	MR. deBETTENCOURT: Objection, form.
2	THE WITNESS: Go ahead.	2	A Well, since we're not in the business of
3	MR. deBETTENCOURT: To the extent this	3	housing anybody that's not here legally, while ITINs
4	question calls for communications with counsel, I'm	4	may exist for some of our residents, the ones we're
5	going to instruct you not to answer. If you're able	5	more interested in is verifying their employment,
6	to answer without relying on communications with	6	making sure that they're in the system, and we know
7	counsel, you can answer the question.	7	that they're in residence legally. I mean,
8	A Well, since all of my information has come	8	everything we do in terms of processing these
9	through counsel, then I guess we're done.	9	documents drives to are they here legally, are they
10	MS. ODOM:	10	working legally.
11	Q Don't get excited just yet. Can you tell	11	MS. ODOM:
12	me --	12	Q Does Mid-City and Edgewood accept ITINs as
13	A No, with that question. Not that we're	13	part of an application for a tenant?
14	done completely, just we're done with that question.	14	A Somebody could hand one of them to us, but
15	Q Do you know what an ITIN is?	15	the thing we'd be interested in is we want to see,
16	A I've seen it.	16	and I'm going to use a generic term here, we want to
17	Q Seen an ITIN?	17	see the Green Card. As you know, Green Cards are
18	A A blank of an ITIN. And I've probably seen	18	not even green anymore, and you also know that Green
19	filled-out ITINs at some point or another.	19	Cards covers a broad range of documents. We want to
20	Q Do you know what an ITIN does for a person,	20	see the documents related to are they here legally
21	what effect it has?	21	and we want to know where their work is, we want to
22	MR. deBETTENCOURT: Objection, form.	22	know that they're employed in an appropriate way.
	54		56
1	A Effectively, as I get it, what that enables	1	Q If a prospective tenant at Mid-City or
2	the federal government to do is get their payroll	2	Edgewood presents a Green Card as part of the
3	taxes.	3	application process --
4	MS. ODOM:	4	A Mm-hmm.
5	Q How does somebody get an ITIN?	5	Q -- is there any sort of enhanced diligence
6	A You register and get one and they give you	6	to verify their employment?
7	an ID number to submit your taxes.	7	A We have a whole package of things, and
8	Q How about a U.S. visa, what does that	8	employment will have to be verified, incomes have to
9	enable a person to do?	9	be verified, and we have to have third-party
10	MR. deBETTENCOURT: Objection, form.	10	documentation, yes.
11	A Depends on the visa. In the case of most	11	Q What sort of third-party documentation?
12	visas, you're going to have to actually look at the	12	A Typically, we get third-party documentation
13	visa document. In many instances it will either	13	from the employer or from an agency that works for
14	allow work or not allow work. Lots of visas are	14	the employer. Some large employers now outsource
15	time limited. There's different types of visas. I	15	that to companies that provide documentation, as you
16	mean, you're -- you know, you're dealing with an	16	may be aware.
17	area that, particularly when you get to immigration	17	Q Is that documentation like pay stubs or
18	laws, is exceedingly complex. You could see all	18	verifications of employment or what does that
19	kinds of forms.	19	consist of?
20	MS. ODOM:	20	A Pay stubs is going to be a last resort only
21	Q Do you have any experience with U.S. visas	21	if we don't have anything else and we're going to do
22	22 or ITINs or I-94 forms?	22	fact checking based on it. Typically, what we are

Transcript of George C. Caruso, CPM, RAM, SHCM, HCCP

15 (57 to 60)

Conducted on December 20, 2016

<p>57</p> <p>1 looking for is when we put it into the system, we're 2 going to want to see a written confirmation of 3 employment from the employer as to wages and as to 4 tenure in that position. The form of that will 5 vary, but that's what we're looking for.</p> <p>6 Q And in your experience, is that customary 7 across residential management companies?</p> <p>8 A Yes.</p> <p>9 Q Will Mid-City and Edgewood accept a foreign 10 passport as proof of identity in the application 11 process?</p> <p>12 A If it has the appropriate visas, with the 13 appropriate work permits, and we can verify it. Or, 14 and I use this term because it's not related to what 15 we do here and I'll just mention it in passing -- I 16 have over the years leased apartments on a regular 17 basis to foreign nationals who are here at the 18 forbearance of the Department of State, in other 19 words, they're diplomats, and we handle diplomats in 20 a different way.</p> <p>21 Q Because they come with the imprimatur of 22 the Department of State?</p>	<p>59</p> <p>1 Q And I want to understand why you think 2 that's the case.</p> <p>3 MR. deBETTENCOURT: Objection, form.</p> <p>4 A Fairly simple answer, and that is, as you 5 know, under the provisions of the change in the laws 6 a few years back, you fill out an I-9. It has to be 7 verified and you have to be here either through I-9 8 or E-Verify. And in order to work legally in this 9 country you gotta be here legally.</p> <p>10 MS. ODOM:</p> <p>11 Q What is E-Verify?</p> <p>12 A E-Verify is the electronic system that CIS 13 stood up to be a faster turnaround to the I-9 14 system. You can do it using E-Verify when you hire 15 somebody now. It's an electronic system. You set 16 up an account. We've been using E-Verify for, I 17 don't know, four or five years. It's just a lot 18 faster than the old I-9 paper systems.</p> <p>19 Q Is every employer required to participate 20 in E-Verify?</p> <p>21 MR. deBETTENCOURT: Objection, speculation.</p> <p>22 MS. ODOM:</p>
<p>58</p> <p>1 A Well, that's number one, and you also -- 2 because they enjoy diplomatic immunity, there's a 3 lot of other things you have to do to assure oneself 4 that you're going to get paid. You can't walk into 5 a landlord-tenant court and throw out a diplomat for 6 not paying the rent. It doesn't happen.</p> <p>7 Q I can imagine the logistical hurdles 8 involved. Does the U.S. government accept foreign 9 passports as proof of identity for foreign 10 nationals?</p> <p>11 MR. deBETTENCOURT: Objection, speculation.</p> <p>12 A I really don't have the means to answer 13 that one way or the other.</p> <p>14 MS. ODOM: All right, let's take a quick 15 break.</p> <p>16 (Off the record.)</p> <p>17 BY MS. ODOM:</p> <p>18 Q So I want to move on to talking about the 19 underwriting of leases. We mentioned it earlier, 20 and in your report you write that legal status is an 21 important factor in underwriting a particular lease.</p> <p>22 A Mm-hmm.</p>	<p>60</p> <p>1 Q You can go ahead and answer.</p> <p>2 A You're required to do one or the other, 3 meaning you have to do it through the I-9 system or 4 you have to do it through E-Verify. E-Verify is not 5 absolutely mandated, but almost everybody I know is 6 moving towards it because it just makes life easier.</p> <p>7 Q And this applies to every employer, whether 8 it's private or government or whether the employee 9 is being hired as a, you know, private contractor, 10 for example?</p> <p>11 MR. deBETTENCOURT: Objection, form.</p> <p>12 A Well, you gotta be careful there. If 13 you're hiring a contractor, you're, by definition, 14 or you'll get in trouble with Labor, not hiring an 15 employee. You know there is a differentiation 16 between the two? You've gotta be very careful about 17 that.</p> <p>18 MS. ODOM:</p> <p>19 Q I am aware of the difference. And my 20 question for you is if someone is being brought on 21 as a contractor, does their employer have to go 22 through the I-9 or E-Verify process?</p>

Conducted on December 20, 2016

	61		63
1	MR. deBETTENCOURT: Same objection.	1	verification systems they're going to use. It's not
2	A Last time I looked, if you're hiring	2	exclusively to approve it.
3	somebody and you're paying them, you've gotta verify	3	Q I'm not sure I understood that answer. So
4	that they're legal to work.	4	if a landlord, such as Mid-City --
5	MS. ODOM:	5	A Mm-hmm.
6	Q Does an individual need to have a Social	6	Q -- gets a Social Security number on an
7	Security number in order to fill out an I-9?	7	application, is that taken as an indication that the
8	A There's a big box on the front side of the	8	applicant is able to work legally in the United
9	I-9 and that's what you gotta have in order to make	9	States?
10	it work in the system.	10	A Well, that's where the process starts.
11	Q A big box containing what?	11	That's where we do the rest of the background checks
12	A A Social Security number (indicating).	12	and the other stuff that goes with it.
13	Q If someone doesn't -- I didn't mean to	13	Q Is it the case that individuals without a
14	interrupt you. I'm so sorry. Go ahead.	14	Social Security number are still able to work
15	A For E-Verify you absolutely have to have	15	legally in the United States?
16	one. For the I-9 system, you've gotta get one or	16	MR. deBETTENCOURT: Objection, speculation.
17	you're going to have to determine what their Social	17	A I haven't been that deep into those regs in
18	Security number is, so you can get the rest of the	18	a while. I just simply -- I'm not going to try to
19	verifications. There are means of alternate -- and	19	give you a guess on that, because that's what it
20	I'm not going to go into it here because I don't	20	would be. I'd have to go look it up.
21	study it day-to-day -- there are alternate means to	21	MS. ODOM:
22	verify, but it all drills against are they here	22	Q But in your experience, you can't recall a
	62		64
1	legally.	1	situation where an individual was legally empowered
2	Q So if someone doesn't have a Social	2	to work in the United States, but did not have a
3	Security number, they may still be able to complete	3	Social Security number?
4	an I-9?	4	MR. deBETTENCOURT: Objection, form.
5	MR. deBETTENCOURT: Objection, form.	5	A Yes, I have. Those have been the diplomats
6	A I suppose. I'm not sure. Since I use only	6	I mentioned earlier.
7	exclusively E-Verify, and you gotta have it to have	7	MS. ODOM:
8	that system work, I don't know how the manual system	8	Q Aside from the diplomats?
9	works. I'm not current on it. I haven't used it in	9	A I've also had military attachés and
10	several years.	10	10 military officers training at the naval base in
11	MS. ODOM:	11	11 Pensacola that, again, did not have, but we had the
12	Q Does the fact that an individual has a	12	12 documentation from the country from which they were,
13	Social Security number prove that they have legal	13	13 where they were citizens, that they were legal to
14	status to work in the United States?	14	14 reside in our apartments while they were attending
15	A Let me answer that by saying yes, we have	15	15 flight school in Pensacola. So, yeah, there are
16	run across fraudulent Social Security numbers.	16	16 some situations you'll see where you've got foreign
17	Q So I don't think that quite answered my	17	17 nationals training at U.S. military facilities or
18	question. My question is whether if a person	18	18 diplomats or other special situations. They're very
19	possesses a Social Security number, does that	19	19 rare.
20	demonstrate to a landlord that that individual has a	20	Q Have you ever encountered anyone, outside
21	legal status to work?	21	those contexts of diplomacy or military training,
22	A It's an indicator in the rest of the	22	where an individual did not have a Social Security

Conducted on December 20, 2016

<p>1 number, but they were still able to work and be 2 employed in the United States?</p> <p>3 MR. deBETTENCOURT: Objection, form.</p> <p>4 A Not that I can recall.</p> <p>5 MS. ODOM:</p> <p>6 Q Have you ever looked it up or seen any 7 studies or articles about that?</p> <p>8 MR. deBETTENCOURT: Same objection.</p> <p>9 A Well, as a manner in policy</p> <p>10 wonk (phonetic), I'm sure I have, but at this moment 11 I can't remember which visas. I spent a lot of time 12 working with those issues when those proposals were 13 first brought up in the early '90s. There was a lot 14 of ground that had to be plowed before those bills 15 became law.</p> <p>16 MS. ODOM:</p> <p>17 Q What is your basis for the statement in 18 your report that, and I quote, any applicant who 19 does not have legal status to work will be unable to 20 obtain employment that can be verified as to 21 duration and amount to permit underwriting?</p> <p>22 A Well, it's actually pretty simple. If</p>	<p>65</p> <p>1 A In the assisted arena if you have someone 2 who is materially misstating their income on the 3 downside, meaning understated their income, there 4 are rules and procedures as to how you give them to 5 the HUD Inspector General or the Department of 6 Justice, because they want a referral on them. And 7 most years towards the end of my career we were 8 doing 15 or 20 referrals a year. There's a whole 9 process when you discover someone has misstated 10 things, particularly in assisted, where you have a 11 meeting, there's a whole due process system laid 12 out, and you go through what's essentially an 13 administrative review, and then act based on that. 14 And there are requirements that folks that have 15 materially -- and the threshold is fairly high. 16 It's about \$10,000 a year of misstatement -- but 17 you're required to make a referral.</p> <p>18 Q How many of those referrals on an annual 19 basis would be for individuals who were foreign 20 nationals or immigrants?</p> <p>21 A Comparatively, few. Matter of fact, off 22 the top of my head, I can't remember any in the last</p>
<p>1 you're working for somebody that's breaking the law 2 by employing them, how do you know that anything 3 else they're going to tell you is the truth.</p> <p>4 Q I'm not sure I understand that answer. Are 5 you suggesting that if an employer employs an 6 undocumented immigrant, they may also misrepresent 7 that individual's wages or duration of employment?</p> <p>8 MR. deBETTENCOURT: Objection, form.</p> <p>9 A Yeah.</p> <p>10 MS. ODOM:</p> <p>11 Q Have you ever had that happen, in your 12 experience?</p> <p>13 A What, where employers have lied to me?</p> <p>14 Yes.</p> <p>15 Q How many times has that happened?</p> <p>16 A In these days, electronic verification and 17 backup checking on stuff, it's more rare than it 18 once was, but it still happens with some regularity, 19 where we'll get something that, as we're doing the 20 underwriting, we find doesn't add up.</p> <p>21 Q How many instances would you say over the 22 last ten years that has happened?</p>	<p>66</p> <p>1 couple of years.</p> <p>2 Q So employer misstatements are typically 3 about citizens of the United States as opposed to 4 immigrants or foreign nationals, in your experience?</p> <p>5 MR. deBETTENCOURT: Objection, form.</p> <p>6 A I can't say I have a scientifically 7 developed view of the statistics on it, but either 8 collusion, where an employer lies to us, on either 9 the high side or the low side because they're trying 10 to help somebody out, or where you've got deep 11 assistance programs and somebody is deliberately 12 misstating their income on the low side, which is a 13 federal offense, you know, those situations, in most 14 cases, you're going to be dealing with somebody 15 that's here legally. As I mentioned earlier on in 16 this process today, we did have a raid, it did 17 emerge that somebody was here on forged documents. 18 They looked, at first impression, like they were 19 legitimate. They turned out not to be.</p> <p>20 MS. ODOM:</p> <p>21 Q How did it come to your attention that the 22 documents were forged?</p>

Transcript of George C. Caruso, CPM, RAM, SHCM, HCCP

Conducted on December 20, 2016

71

1 MR. deBETTENCOURT: Objection, form.
 2 **A When my site manager had a conversation**
 3 **with the Assistant U.S. Attorney and they were**
 4 **starting to work the case up after the raid.**

5 MS. ODOM:

6 Q In your experience, is there any way to
 7 assess whether a document is a forgery, short of
 8 talking to the DOJ, for example?

9 MR. deBETTENCOURT: Same objection.

10 **A Well, most of the documents that we see in**
 11 **application processes in recent years have been**
 12 **moved to more secure forms of documentation, meaning**
 13 **that if you know what you're looking at, it's**
 14 **tougher to misrepresent a document than it used to**
 15 **be. But I have occasionally seen some mighty good**
 16 **forgeries.**

17 MS. ODOM:

18 Q So how have the document verification
 19 processes changed to make it more difficult to pass
 20 off a forgery? Can you give me some specifics on
 21 that?

22 MR. deBETTENCOURT: Same objection.

69

1 Q When you said you've seen some --
 2 THE WITNESS: Guys?
 3 MS. ODOM: I'm sorry, please go ahead.
 4 THE WITNESS: We need a quick break. This
 5 is my sister on the phone. She doesn't normally call
 6 me. I'm going to step out. I'll be right back.
 7 (Off the record.)

8 BY MS. ODOM:

9 Q So before we took the brief break we were
 10 talking about the need to verify someone's sustained
 11 legitimate employment as part of the underwriting of
 12 a lease.

13 **A Mm-hmm.**

14 Q Would an alternative be to verify whether
 15 an applicant has reserved funds sufficient to cover
 16 the rental amounts for the lease period as opposed
 17 to employment?

18 **A Well, in some cases you will be dealing**
 19 **with someone that's either living off assets or has**
 20 **transfer payments or things like that, yes,**
 21 **particularly when you're dealing with a senior**
 22 **citizen that's no longer working, but, again,**

70

1 **A Well, I guess the first specific is if you**
 2 **reach into your purse and get out your driver's**
 3 **license, it looks a lot different than the driver's**
 4 **licenses we got when I first started driving 50**
 5 **years ago. Mine didn't have a picture on it. It**
 6 **didn't have a piece of paper. I'll just give you**
 7 **one illustration. This is not directly relevant,**
 8 **but I'm getting close. That's my NEXUS card from**
 9 Customs (indicating). It has four or five, on each
 10 side, infrared, readable security features and all
 11 kind of other stuff, including this goofy little
 12 globe and all that other stuff. I mean, a lot of
 13 the documents you see now are higher security. If
 14 you have a passport, you've probably seen the recent
 15 ones, and higher security now with an electronic
 16 chip in them. So, you know, the documents we see
 17 are higher security than they used to be. The one
 18 that still is the lowest security on the planet, as
 19 near as I can ascertain, is the Social Security card
 20 because it's still printed on paper and it doesn't
 21 have any security features to it.

22 MS. ODOM:

71

1 **there's ways to verify those sources as well.**
 2 Q And would a person's legal status in the
 3 United States necessarily be relevant to whether
 4 they had reserved funds or assets available to pay
 5 the rental amounts?

6 **A Help me out. I'm trying to understand what**
 7 **you're asking here.**

8 Q Sure. So if the person's legal status is
 9 relevant to whether they can get employment and
 10 that's part of --

11 **A Mm-hmm.**

12 Q -- the risk assessment for a potential
 13 lease, my question is --

14 **A Mm-hmm.**

15 Q -- do we still care, in underwriting a
 16 lease, if the person is legally present in the
 17 United States if they've been able to demonstrate
 18 the funds available to pay the rental amounts for
 19 the lease?

20 **A You run into the conundrum of if you don't**
 21 **underwrite every lease exactly the same way and**
 22 **verify the same things, you have the Fair Housing**

Conducted on December 20, 2016

<p>73</p> <p>1 exposure.</p> <p>2 Q And what statute would that be?</p> <p>3 MR. deBETTENCOURT: Objection, form.</p> <p>4 A I don't carry it around, but you've got</p> <p>5 the -- I mean, you have three major Fair Housing</p> <p>6 Acts and you have enough implementation language on</p> <p>7 that, on the HUD side, that it literally fills</p> <p>8 books, but the key thing that I've emphasized</p> <p>9 throughout here, and will continue to emphasize, is</p> <p>10 that you've got to underwrite every application</p> <p>11 using the same methodology all the time. In other</p> <p>12 words, you determine what your steps are to</p> <p>13 underwrite it, you follow the steps, you verify</p> <p>14 things in regard to those steps. You literally step</p> <p>15 through the process the same way for every</p> <p>16 applicant. Now, sources of income will vary, but</p> <p>17 you follow the process consistently for every</p> <p>18 applicant.</p> <p>19 MS. ODOM:</p> <p>20 Q Is a Social Security number required to</p> <p>21 verify the identity of a prospective applicant?</p> <p>22 A It's one of the pieces of information</p>	<p>75</p> <p>1 we come up with of those, and that's where Social</p> <p>2 Security numbers and dates of birth become really</p> <p>3 important, because you can get multiple people with</p> <p>4 the same name and they'll pop up, and you have to go</p> <p>5 isolate whether it's the person that you're looking</p> <p>6 at is the right person.</p> <p>7 Q So is a Social Security number used to pull</p> <p>8 up an individual on a sex offender registry or to</p> <p>9 pull up some sort of criminal file?</p> <p>10 MR. deBETTENCOURT: Objection, compound.</p> <p>11 A Depends on the state, depends on the</p> <p>12 locality, depends how they design the database.</p> <p>13 MS. ODOM:</p> <p>14 Q Are you familiar with the Yardi company?</p> <p>15 A I am.</p> <p>16 Q How are you familiar with Yardi?</p> <p>17 A For several years, for one of our big</p> <p>18 owners, we used the Yardi product suite.</p> <p>19 Q Was that Mid-City or Edgewood?</p> <p>20 A It was Edgewood.</p> <p>21 Q Does Edgewood still use Yardi?</p> <p>22 A We don't have those buildings anymore. We</p>
<p>74</p> <p>1 you're generally going to use. You'll generally be</p> <p>2 using date of birth as well, because most of the</p> <p>3 commercial databases that we use to do verifications</p> <p>4 are going to trigger off of those two items. And if</p> <p>5 you get a false positive, those are the two items</p> <p>6 that you start looking at to determine why you might</p> <p>7 have a false positive.</p> <p>8 Q Are there other pieces of information that</p> <p>9 could be used?</p> <p>10 A Well, typically, you're also going to use</p> <p>11 the last -- depending on their tenure, most of the</p> <p>12 commercial systems that I'm aware of that we use to</p> <p>13 do our verifications, are going to look at the last</p> <p>14 somewhere between five and seven years worth of</p> <p>15 residences, and they're going to look at the credit</p> <p>16 files, and the credit files are going to show names,</p> <p>17 addresses, residences, positions, and what have you</p> <p>18 in them, so it's all part of a blend. And then,</p> <p>19 finally, when you get to the last piece, which is</p> <p>20 checking on your criminal history and the sex</p> <p>21 offender registries, you're going to need those</p> <p>22 because you'd be surprised how many false positives</p>	<p>76</p> <p>1 were doing work for our colleagues at a major super</p> <p>2 regional bank, that I'd prefer not to identify, and</p> <p>3 they took back a portfolio of 15 properties, and</p> <p>4 this particular bank used -- Yardi also does banking</p> <p>5 and financial industry back-office software. Do you</p> <p>6 understand what I mean by that?</p> <p>7 Q I do.</p> <p>8 A Okay. Yardi has a suite of back office and</p> <p>9 this particular client wanted us to use Yardi on the</p> <p>10 front end because it uploaded to their back office</p> <p>11 more easily.</p> <p>12 Q Does Mid-City and Edgewood currently use an</p> <p>13 entity like Yardi to perform background checks on</p> <p>14 prospective tenants?</p> <p>15 A At this point we use exclusively RealPage</p> <p>16 software. We don't use -- RealPage is one of</p> <p>17 Yardi's competitors.</p> <p>18 Q Are you familiar with CoreLogic?</p> <p>19 A I've heard the name. Beyond that, I'm not.</p> <p>20 Q Does RealPage require a Social Security</p> <p>21 number to run a criminal background check?</p> <p>22 A Bearing in mind it's been a couple of years</p>

Conducted on December 20, 2016

<p>1 since I've been inside that program, last time I 2 looked that's one of the designators that's built 3 into it, because it picks it up off of the 4 applications automatically.</p> <p>5 Q My question is a little bit different. The 6 question was whether a Social Security number is 7 required to be input for the program to run?</p> <p>8 MR. deBETTENCOURT: Objection, form.</p> <p>9 A Remember, you get to customize the user 10 interface with all these software programs, and our 11 interface was customized so that it did require a 12 Social Security number.</p> <p>13 MS. ODOM:</p> <p>14 Q Do you have any opinion on whether Yardi is 15 a good quality company?</p> <p>16 MR. deBETTENCOURT: Objection, form.</p> <p>17 A I have friends who are either still senior 18 executives there or recently-retired senior 19 executives there and I hold them in very high 20 regard. It's a quality company run by quality 21 people.</p> <p>22 MS. ODOM:</p>	<p>77</p> <p>1 have to look further to see why you're getting the 2 flag.</p> <p>3 MS. ODOM:</p> <p>4 Q But is a Social Security number able to 5 reveal anything about prior residences?</p> <p>6 MR. deBETTENCOURT: Objection, form.</p> <p>7 A On its own, as a number, and not knowing 8 how the software company set the algorithm up, I 9 can't answer that, because these days all of that 10 stuff is driven off of these big proprietary 11 algorithms. And even if you're their customer, they 12 won't let you see how exactly the black box works.</p> <p>13 MS. ODOM:</p> <p>14 Q Is a Social Security number required to run 15 a credit check?</p> <p>16 MR. deBETTENCOURT: Objection, form.</p> <p>17 A There was a time, when I was doing business 18 with TRW, that you wouldn't get one back if you 19 didn't feed them one. I think these days, with the 20 RealPage vendors that we have, that may no longer be 21 the case. I haven't looked at the issue in a while.</p> <p>22 You have to understand I go so far back that when I</p>
<p>1 Q Is a Social Security number able to reveal 2 an applicant's past five to seven years of 3 residences?</p> <p>4 A You're going to need to help me out what 5 you're going for there because the Social Security 6 number and underwriting leasing systems I'm familiar 7 with is only one piece of the database you feed to 8 it as it goes out and does its lookup.</p> <p>9 Q Okay, so my question is -- you mentioned as 10 part of the verification of a tenant's identity in 11 underwriting the lease --</p> <p>12 A Right, right.</p> <p>13 Q -- you get their Social Security number, 14 you get their date of birth, and you said you also 15 look at their past five to seven years of 16 residences; is that right?</p> <p>17 MR. deBETTENCOURT: Objection, form.</p> <p>18 A We will ask them what their most recent 19 three residences have been, because we're going to 20 want to pick that up and compare it. Again, all of 21 this is part of when you get the report back, if 22 some data elements don't match, it flags it, and you</p>	<p>78</p> <p>1 did credit checks when I was first a site manager 45 2 years ago, you literally called somebody and you 3 could hear them rifling, on the other end of the 4 phone, through a card index, and they read you what 5 they have. These days it's all done inside these 6 big algorithms and we don't see much of what it is. 7 The site staff just gets a green, yellow or red 8 indicator and handles it based on that. I mean, the 9 system has been so thoroughly automated now, that 10 you don't see inside the black box anymore. I don't 11 know precisely how the black box works.</p> <p>12 MS. ODOM:</p> <p>13 Q Do you know whether an ITIN number can be 14 used to run a credit check?</p> <p>15 A Against, since I'm using integrated systems 16 and I'm not running stand-alone credit checks 17 anymore, I can't speak to that.</p> <p>18 Q So you just don't have an opinion one way 19 or another on that?</p> <p>20 MR. DeBETTENCOURT: Objection, 21 mischaracterize.</p> <p>22 A (No verbal response.)</p>

Conducted on December 20, 2016

	81		83
1 MS. ODOM:		1 Q And how you write leases is one of the	
2 Q Why is it necessary to separately		2 subjects that is avoided?	
3 underwrite every adult in a household?		3 A How you write leases is one of the subjects	
4 MR. deBETTENCOURT: Objection, form.		4 that I studiously avoid, yes.	
5 A In most cases the leases that we write are		5 Q So to the extent that you are giving an	
6 called joint and severals. You're a lawyer. You		6 opinion in your report about how to underwrite a	
7 know what a joint and several lease is, so...		7 lease, it comes from your own personal experience	
8 MS. ODOM:		8 over your career?	
9 Q So to make sure I understand your opinion		9 A It comes from the leases I underwrite or in	
10 right, it seems to be your testimony that you		10 firms I control or am executive in.	
11 underwrite separately every adult applicant, so that		11 Q And not in any way from information that	
12 each individual over the age of 18 in the household		12 you've obtained from anyone else in the residential	
13 can be held responsible to pay the lease?		13 property management business?	
14 MR. deBETTENCOURT: Objection,		14 A (Inaudible.)	
15 mischaracterize.		15 MR. deBETTENCOURT: Objection, form.	
16 MS. ODOM:		16 Sorry. Sorry, Mr. Caruso.	
17 Q Is that right?		17 Objection, form.	
18 A We use joint and several leases, so we		18 THE WITNESS: Got it.	
19 underwrite on the basis that under the joint and		19 MR. deBETTENCOURT: You may answer.	
20 several provisions we can collect. Not everybody		20 A We don't have -- we don't sit and have	
21 uses joint and several leases. We do.		21 conversations about that.	
22 Q Are you aware of any landlords or		22 MS. ODOM:	
	82		84
1 residential property management companies in		1 Q And included in how an entity may write a	
2 northern Virginia that do not use joint and several		2 lease would be what documents that entity requires	
3 leases?		3 from its prospective tenants to apply?	
4 A I'm going to answer that in a very		4 A Mm-hmm.	
5 elliptical way, and that is I specifically don't get		5 MR. deBETTENCOURT: Objection, form.	
6 into those kinds of conversations with my colleagues		6 MS. ODOM:	
7 in Virginia or Maryland, because all of us are of a		7 Q And how an entity may assess whether an	
8 certain age and remember what happened to two big		8 individual is legally present within the United	
9 management companies that still exist, and I'm not		9 States?	
10 going to embarrass them by naming them, when the		10 MR. deBETTENCOURT: Same objection.	
11 Justice Department came after them for antitrust for		11 A I've been to some training forums where	
12 discussing how they went about their business, and		12 there's been generalized discussions about this is	
13 ruined three people's careers. So the short answer		13 how you're going to need to report on this and this	
14 is I studiously avoid those conversations when I'm		14 is what they're going to look at if they challenge	
15 having lunch with my friends because there's some		15 you, and the they in this case being a regulator.	
16 things you never talk about. You never talk about		16 So, yeah, from time to time I've been to legal	
17 how you price your management services, you never		17 updates on that, where the regulators have shared	
18 talk about how you write leases, and you never talk		18 what they want to see.	
19 about anything that can be deemed antitrust or		19 MS. ODOM:	
20 collusive behavior. And I'm sure, as a member of		20 Q Does Edgewood and Mid-City write joint and	
21 the Bar, you understand exactly why I do that.		21 several leases where one adult in the household is	
22 There's some subjects you don't discuss.		22 unemployed?	

Transcript of George C. Caruso, CPM, RAM, SHCM, HCCP

22 (85 to 88)

Conducted on December 20, 2016

	85		87
1	MR. deBETTENCOURT: Objection, form.	1	disabled and there's no transfer of payments, that
2	A You're going to need to parse that question	2	immediately raises the flag, wait a minute, are they
3	more carefully. On the conventional side we may	3	getting SSI or some other form of transfer payment,
4	well do it. On the assisted side there's a whole	4	and they're not declaring it because it would raise
5	set of rules and there is literally an 800-page	5	their family contribution.
6	manual about how you write leases with family	6	Q But, again, just to remind you, we're
7	compositions on members over 18 that we have to	7	discussing on the non-assisted side.
8	comply with.	8	A Yeah, okay. On the non-assisted side we'd
9	MS. ODOM:	9	probably still take a quick look at it, but I think
10	Q Okay. So let's take it on the non-assisted	10	10 if the one who is employed had enough income that
11	side. So for --	11	11 they could cover it, yeah, but bear in mind, our
12	A Mm-hmm.	12	12 policy is we also make sure that people are here
13	Q -- properties or complexes that don't	13	13 legally.
14	receive financial assistance from the government.	14	Q Well, same question and the same premise,
15	A Mm-hmm.	15	15 on the non-assisted side if you have, let's say, a
16	Q If you have, let's say, a couple that	16	16 parent who applies, alongside a 19-year-old,
17	applies --	17	17 unemployed child, would such a lease be written even
18	A Mm-hmm.	18	18 though the child over the age of majority was
19	Q -- for a lease, and let's say the male is	19	19 unemployed?
20	employed, but the female is a stay-at-home parent,	20	A Is the child a student?
21	for example, would Mid-City or Edgewood write such a	21	Q Let's assume no.
22	lease?	22	A Again, you take -- I'll take it apart. And
	86		88
1	MR. DeBETTENCOURT: Same objection.	1	1 if it's an adult child living at home, again, if
2	A The short answer would be probably, if the	2	2 the -- well, we're going to get down in the weeds.
3	3 income was sufficient, and the duration -- and	3	3 Is that adult child on the lease as a leaseholder or
4	4 the -- the employment history was steady enough that	4	4 are they on the lease as another adult present in
5	5 we didn't regard it as an untoward risk.	5	5 the household?
6	MS. ODOM:	6	Q As another adult present in the household.
7	Q Okay. Same question if you have a pair of	7	A Well, that means they're not responsible
8	applicants on the non-assisted side, and you have	8	8 for payment of the rent.
9	one individual, who is able-bodied and working, and	9	Q Okay. So --
10	you have one individual who's disabled and not	10	A And they don't have any hold over tenancy
11	receiving disability income and not able to work,	11	11 rights either.
12	would that lease be written as well under those same	12	Q So just to make sure I understand the
13	conditions that you stated?	13	details of the joint and several leases that we're
14	MR. deBETTENCOURT: Same objection.	14	discussing, that Edgewood and Mid-City write, even
15	A That would get looked at a lot more	15	15 though every adult in the household must submit an
16	carefully and taken apart, because it's been my	16	16 application, it can be the case that only one adult
17	experience you have almost nobody that's fully	17	17 is actually responsible for payment of the lease?
18	disabled that doesn't have some form of transfer	18	MR. deBETTENCOURT: Objection, mis --
19	payment coming to them.	19	A No, they're both responsible for payment --
20	MS. ODOM:	20	MR. deBETTENCOURT: Sorry, Mr. Caruso.
21	Q Why would that be looked at more carefully?	21	THE WITNESS: Go ahead.
22	A Well, if they're saying -- if somebody is	22	MR. deBETTENCOURT: Objection,

Conducted on December 20, 2016

<p>89</p> <p>1 mischaracterize.</p> <p>2 You may answer.</p> <p>3 A That was where I was going. You gotta be 4 careful about that and that's far too general an 5 answer. You've gotta make sure that the lease is 6 going to get paid. And, again, since it's a joint 7 and several, you can collect against everybody 8 whether they have income or not.</p> <p>9 MS. ODOM:</p> <p>10 Q Even if one individual is a resident and 11 one individual --</p> <p>12 A If they're a person on the lease, you're 13 going to take everybody to court, not just the 14 person who has a job.</p> <p>15 Q Should it be different in the case of a 16 husband, for example, who meets all the underwriting 17 requirements, but his wife is unable to, even though 18 she's only a resident?</p> <p>19 MR. deBETTENCOURT: Objection, form.</p> <p>20 A If it's a spouse, we probably wouldn't cut 21 the lease where they're only a resident. We want 22 everybody to meet all the requirements. That</p>	<p>91</p> <p>1 on the same terms. So if you have --</p> <p>2 A I don't want to be accused of -- I don't 3 want to be accused of disparate policies on the 4 assisted versus the conventional side. We use one 5 set of policies. We've chosen to adopt the federal 6 standard across the board.</p> <p>7 Q Okay. Well, I'd like to -- what I'm trying 8 to do is just understand the contours of the 9 opinions that you've offered in the case.</p> <p>10 A Mm-hmm.</p> <p>11 Q And so in that vein, I'd like to ask you to 12 consider this hypothetical, which I'll go ahead and 13 lay out. If you have a property that's not assisted 14 and it doesn't have a side of the business that is 15 assisted, there's no -- there's not going to be a 16 claim of disparate treatment on the assisted versus 17 non-assisted side, and that property writes a lease 18 for a male applicant, who meets underwriting 19 criteria, and the only reason why a lease is being 20 terminated is because that individual's wife is 21 undocumented, would that be something that Mid-City 22 and Edgewood would terminate a lease for?</p>
<p>90</p> <p>1 doesn't necessarily equate to she has to have a job, 2 but it means she has to meet all the other 3 requirements.</p> <p>4 MS. ODOM:</p> <p>5 Q So to make sure I understand your answer, 6 Edgewood and Mid-City would not terminate a lease if 7 a male met all of the underwriting requirements, 8 including legal status in the U.S., but the wife, 9 who was only listed as a resident in the home, did 10 not meet the same requirements?</p> <p>11 MR. deBETTENCOURT: Objection, 12 mischaracterize.</p> <p>13 MS. ODOM:</p> <p>14 Q You can answer.</p> <p>15 A Well, as Counsel said, you're 16 mischaracterizing it. You've gotta be cautious 17 there, and that is if the other adult present, 18 meaning the wife, if they're not here legally, under 19 the tenant selection plans we use, since they're 20 consistent on both sides of the business, we're not 21 going to cut a lease for her.</p> <p>22 Q I'm not sure -- I'm not sure we're talking</p>	<p>92</p> <p>1 MR. deBETTENCOURT: Objection, form.</p> <p>2 A Was the wife there -- was the wife there 3 originally when the lease was first cut?</p> <p>4 MS. ODOM:</p> <p>5 Q Well, under our hypothetical the wife has 6 always been present in the home, but there's been a 7 recent policy change that required her to be listed 8 on the lease as a resident.</p> <p>9 MR. deBETTENCOURT: Objection, form.</p> <p>10 A Okay, so, hypothetically -- not how I do 11 it, but, hypothetically, there's been a policy 12 change and now all the adults have to be on the 13 lease. If your policy is that all adults having to 14 be on the lease also have to reside here legally, 15 you would not lease in that circumstance because 16 it's a violation of the admission standards you've 17 adopted. You've got to be consistent against your 18 admission standards.</p> <p>19 MS. ODOM:</p> <p>20 Q Okay, well, again, we're talking about an 21 existing lease. We're talking about a lease that 22 existed before a policy emerged requiring the wife</p>

Conducted on December 20, 2016

	93		95
1 to be on the policy.		1 BY MS. ODOM:	
2 A Which means that the next time the lease		2 Q I wanted to go back to what was the	
3 comes up for its annual renewal, they have to meet a		3 question that you were asked to answer in your	
4 different set of standards because you've changed		4 report?	
5 your tenant selection standards, which means that		5 MR. deBETTENCOURT: Objection.	
6 potentially that lease wouldn't be renewed if it		6 To the extent that this question calls for	
7 didn't meet the new standards.		7 communications between counsel, on the basis of	
8 Q Is that a reason for nonrenewal that		8 privilege, I'm going to instruct you not to answer.	
9 Edgewood or Mid-City would put forward?		9 A I would be following the lawyer's	
10 MR. deBETTENCOURT: Objection, form		10 instructions.	
11 A We were talking a hypothetical, not		11 MS. ODOM:	
12 Edgewood and Mid-City, because Edgewood and Mid-City		12 Q Are you able to tell me anything about what	
13 follow the federal rule. She wouldn't have gotten		13 the purpose of your report is?	
14 there to begin with because we would have made sure		14 MR. deBETTENCOURT: Mr. Caruso, you can	
15 when we initially – since 19, I don't know, 94,		15 discuss the facts and data you relied on in your	
16 when these regs came in, we've underwritten		16 report, the opinions that you came to in your report,	
17 everybody the same way.		17 but the communications with counsel about your report	
18 MS. ODOM:		18 are privileged under Rule 26.	
19 Q Have you read the Complaint in this case?		19 THE WITNESS: Okay.	
20 A Nope, I have not. I have not.		20 A Very generally, the questions that were	
21 Q Do you think that the information contained		21 posed to me are what is your normal practice and	
22 in the Complaint may be relevant to your opinion?		22 what do you believe to be the industry practices,	
	94		96
1 A I was asked a fairly narrow set of		1 and that's what I -- that's what I discussed, those	
2 questions, and that is what do you think is the		2 three basic elements that all tie together.	
3 appropriate set of standards --		3 MS. ODOM:	
4 MR. deBETTENCOURT: Mr. Caruso, to the		4 Q And I believe, as you testified earlier,	
5 extent --		5 and I don't want to misstate it, so please correct	
6 THE WITNESS: Go ahead.		6 me if I'm wrong, but your relation of what industry	
7 MR. deBETTENCOURT: -- to the extent this		7 practice is is based on your own personal knowledge	
8 question calls for any communications with counsel,		8 over your career; is that right?	
9 I'm going to instruct you not to answer. You may		9 MR. deBETTENCOURT: Objection, mischarac --	
10 answer the question outside of -- outside of that.		10 A That's correct.	
11 And I'm instructing you not to answer on the basis of		11 MS. ODOM:	
12 privilege.		12 Q Because it's not advisable or possible to	
13 A Then I think we have our answer.		13 discuss things like how to write a lease with other	
14 MS. ODOM:		14 property management companies?	
15 Q So I want to make sure I understand the		15 MR. deBETTENCOURT: Same objection.	
16 extent of the opinions that you're offering in this		16 A As I said earlier, I saw some friends'	
17 case.		17 careers end up in flames over those discussions, so,	
18 A I'll be happy to let you understand it in		18 yes, I've been very careful about that.	
19 three minutes.		19 MS. ODOM:	
20 MS. ODOM: Okay. We'll go off the record		20 Q So we've mentioned a few times, in the	
21 and take a quick break.		21 1990s there became legislation about fair housing,	
22 (Off the record.)		22 and I want to make sure that we're talking about the	

Transcript of George C. Caruso, CPM, RAM, SHCM, HCCP

25 (97 to 100)

Conducted on December 20, 2016

	97
1 same act. Are you referring to the Personal 2 Responsibility and Work Opportunity Reconciliation 3 Act of 1996?	99
4 MR. deBETTENCOURT: Objection, form. 5 MS. ODOM: 6 Q It's called PRWORA colloquially. 7 A I'd have to go stick my head -- was the 8 principal sponsor on that Henry Hyde? 9 Q I can look and check. 10 A The reason I say that is we've always 11 called it internally the Hyde bill, but 12 Representative Hyde was chairman of the committee. 13 You know, I've had to deal, over the years, with all 14 these long acronyms that they invent over on the 15 Hill and I've gotten to the point where, 16 unfortunately, I know most things by bill numbers, 17 not by bill titles, because it's just easier. I 18 think, but can't guarantee, we're talking about the 19 same thing.	100
20 Q And your opinion and testimony is that 21 federal regulations require entities who receive 22 deep assistance to check legal status of tenants?	100
1 MR. deBETTENCOURT: Objection, 2 mischaracterize. 3 A Among other places, that's a requirement in 4 the HUD Occupancy Handbook, 4350.3. It's also a 5 requirement in the HUD Public Housing Handbook of 6 similar type. I don't remember the PIH. 7 THE WITNESS: That's -- for our recorder, 8 that's Public and Indian Housing. Sorry I was 9 engaging in HUD speak. 10 A PIH also has a manual that relates to a 11 different manual number, but that's a requirement of 12 the 4350.3, which goes upwards and connects with the 13 legislation. 14 MS. ODOM: 15 Q Do you know whether PRWORA that was passed 16 in 1996 regulates Waples Mobile Home Park? 17 MR. deBETTENCOURT: Objection, form. 18 A Without sitting down and reading the bill, 19 I wouldn't be able to answer that. 20 MS. ODOM: 21 Q And same answer as to whether it applies to 22 any of the other A.J. Dwoskin properties?	100

Transcript of George C. Caruso, CPM, RAM, SHCM, HCCP

26 (101 to 104)

Conducted on December 20, 2016

	101		103
1 Q	Would part of that staff be property	1 verification of an individual's legal status in the	
2 managers?		2 United States?	
3 A	Yeah, site managers.	3 MR. deBETTENCOURT: Objection, asked and	
4 Q	So would you expect site managers to know	4 answered.	
5 whether a HUD manual applies to a particular		5 MS. ODOM:	
6 property?		6 Q You can answer.	
7 MR. deBETTENCOURT:	Objection, form.	7 A Because it's more convenient for me to do	
8 A	I can't speak -- I can't speak for other	8 so, I run all of my tenancy checks through the	
9 companies. I can say that over the nature of my		9 company, rather than buying separate licensing. So	
10 career, I want my site managers to know how they're		10 the short answer is that my tenants get subjected to	
11 regulated and I want them to know the particulars.		11 the same standards as anybody that leases from	
12 Having said that, I am unusual in this business in		12 Edgewood.	
13 the sense that I also share with my site managers		13 Q Give us just one second, Mr. Caruso. I	
14 something a lot of my colleagues do not. My site		14 think we're just about done.	
15 managers know how the properties are financed and my		15 A Sure.	
16 site managers have access to budgets and payrolls.		16 Q But let me check with my colleague.	
17 MS. ODOM:		17 A Okay.	
18 Q	How do you know that your colleagues in the	18 Q One last question for you. Do you have an	
19 industry do not share that financial information		19 opinion on whether undocumented tenants are any more	
20 with property managers?		20 dangerous or likely to be a risk to the safety of	
21 A	I've been in enough meetings and lunches	21 the community than documented individuals?	
22 with colleagues, where we've discussed budgeting		22 A With all due respect, Counselor, that's	
	102		104
1 matters and other things, that there's a wide		1 kind of like asking, when did you stop beating your	
2 variance among firms as to what site managers and		2 wife to a politician.	
3 first-level supervisors know and what they don't		3 Q Well, respectfully, I think it is a little	
4 know in terms of how the company is organized and		4 bit different. Do you have any experience that	
5 how things are done. Various owners have various		5 leads you to believe they're more dangerous?	
6 policies on that. We take a very liberal view, but		6 MR. deBETTENCOURT: You may continue,	
7 we make it very clear to our folks that all this is		7 Mr. Caruso.	
8 considered confidential information, and they're		8 A It's been my experience that I can have --	
9 going to be sitting in my office, having a career --		9 I got -- I'm very blessed to have the vast majority	
10 a potentially career-changing discussion if any of		10 of the folks that live with us are good people and	
11 that material is shared outside of the company, but		11 do the right thing all the time. We have some	
12 not everybody takes as broad a view as I do.		12 number of rogues, fools, thieves, and bad actors	
13 Q	Do the HUD manuals regulate any A.J.	13 among us. I've never differentiated as to whether	
14 Dwoskin policy or property, to your knowledge?		14 or not they're here legally or not, because the	
15 MR. deBETTENCOURT:	Objection, form.	15 bottom line is if you're dealing drugs on one of my	
16 A	Don't know. Can't answer without knowing	16 properties, you're going to be off of my properties.	
17 how they're structured.		17 If you're assaulting somebody, you're going to be	
18 MS. ODOM:		18 off of my properties. And whether you're here	
19 Q	In your own personal assets that you have	19 legally or not is not going to be one of the first	
20 in management --		20 considerations in my mind. The first consideration	
21 A	Mm-hmm.	21 in my mind is you're going. So that may be an	
22 Q	-- do you have a policy related to the	22 elliptical answer, but that's what it comes down to.	

Conducted on December 20, 2016

	105		107
1 I haven't studied the statistics. So there you are,		1 capacity?	
2 Joy.		2 A On a fairly regular basis, when we do	
3 MS. ODOM:		3 refinancings, we have to submit with the refinancing	
4 Q So if I understand your answer, you don't		4 applications evaluations of crime in both the	
5 have any specialized -- or knowledge one way or		5 neighborhood and in our particular properties,	
6 another as to whether undocumented immigrants pose a		6 because that's reviewed as part of grant-making and	
7 greater risk to safety than documented tenants?		7 other decisions, so there have been instances where	
8 MR. deBETTENCOURT: Objection,		8 I've had to get intensively into data. I have also	
9 mischaracterize --		9 had to respond to, in the District of Columbia,	
10 (Simultaneous conversation.)		10 petitions to seize property over criminal behavior	
11 A (Inaudible.)		11 on properties for some of my fee owners. Not to	
12 MS. ODOM:		12 make a long answer out of it, the Assistant U.S.	
13 Q Do you have any --		13 Attorneys have a statute in D.C. that allows them to	
14 (At which time the court reporter requested		14 initiate procedures to seize property if they see	
15 clarification regarding the answer.)		15 that the owner is not combatting crime and drugs	
16 A Well, let's just go with the objection, but		16 effectively, and I've had to respond to some of	
17 we have bad behavior. I don't try to parse it		17 those complaints post raids.	
18 between people that are here legally and people that		18 Q Did the data that you're referring to in	
19 are not. Bad actors are going to go out of my		19 that answer relate in any way to an undocumented	
20 properties.		20 immigrant subset of the population in either the	
21 MS. ODOM:		21 communities of Mid-City and Edgewood or outside?	
22 Q Mr. Caruso, do you have any specialized		22 A Among the data you have to pull is you have	
	106		108
1 knowledge as to whether crime rates are higher or		1 to get with the police agencies, pull the arrest	
2 lower in an undocumented immigrant population as		2 records, and pull the backgrounds on the arrest	
3 opposed to citizens or documented immigrants?		3 records, in some cases your lawyers will be looking	
4 A We, from time to time, as part of our		4 at the court records, so occasionally,	
5 reporting to ownership, look at major crimes and we		5 coincidentally, it will pop up as to what status	
6 work with the police agencies of all the places		6 might be. In most cases it's going to be	
7 where I work. And it has been my experience that		7 demonstrating that you are taking the necessary	
8 criminal behavior is more tied to lack of income and		8 steps not to admit people to a property who are	
9 lack of education than just about any other index		9 likely to prey on other people and who are not going	
10 you're going to find.		10 to be in there distributing drugs and in there	
11 Q Do you have any specialized knowledge as to		11 distributing -- in the case of the District, in the	
12 whether undocumented tenants are any more likely not		12 case of Maryland, in there distributing weapons.	
13 to pay rent?		13 Virginia has much different set of rules regarding	
14 A Meaning do I have empirical knowledge of		14 weapons than do the District and Maryland and New	
15 that?		15 Jersey.	
16 Q Sure. Let's start there.		16 Q But did those efforts to collect and report	
17 A No, I don't have empirical data on that.		17 data tell you anything or enable you to learn	
18 Q Do you have any sort of data on that?		18 anything about whether undocumented immigrants are	
19 A Occasional conversations over lunch with		19 more likely to be violent, for example, than a	
20 some of my colleagues, but none of it would rise to		20 documented person?	
21 the level of even the most basic scientific rigor.		21 MR. deBETTENCOURT: Objection, form.	
22 Q Have you researched it otherwise in any		22 A I haven't seen any data leaping off the	

Transcript of George C. Caruso, CPM, RAM, SHCM, HCCP

28 (109 to 112)

Conducted on December 20, 2016

<p>109</p> <p>1 page speaking one way or the other to it. The only 2 corollary that I would suggest, because I have seen 3 this, is to the extent someone is working in the 4 black economy, it makes them more prey to earning 5 their living in inappropriate ways, meaning if the 6 only job you can get is one distributing drugs or 7 moving illegal weapons or stealing automobiles, you 8 might see a correlation.</p> <p>9 MS. ODOM:</p> <p>10 Q Is it your opinion that individuals engaged 11 in those criminal enterprises are more likely to be 12 undocumented immigrants?</p> <p>13 MR. deBETTENCOURT: Objection, form.</p> <p>14 A No, I didn't say that. I just said if you 15 can't get legitimate employment otherwise. Now, 16 there's a lot of reasons why you might not be able 17 to get legitimate employment otherwise, not least of 18 which is you've recently been released from prison, 19 not least of which is you don't have an education, 20 not least of which is a number of things, but, you 21 know, recognizing that I've had to spend a lot of 22 the last 30 years fighting drugs and other things in</p>	<p>111</p> <p>1 skips, but we attribute that, for the most part, 2 that we are pretty careful on admits.</p> <p>3 MS. ODOM:</p> <p>4 Q Outside the Edgewood and Mid-City context, 5 are you aware of whether skips, as you put it, are 6 more likely to be undocumented immigrants?</p> <p>7 A I don't really have any data on it because 8 I haven't had any conversations with any of my 9 colleagues on it one way or the other.</p> <p>10 Q Do you have any specialized knowledge as to 11 whether it's more difficult to properly identify a 12 prospective tenant? And for reference, I'm looking 13 at page 2 of your report, where it discusses the 14 fundamental part of underwriting a lease application 15 is having proper identification of the applicant.</p> <p>16 MR. deBETTENCOURT: Objection, form.</p> <p>17 You may answer.</p> <p>18 A You need to know who they are and you need 19 to be able to determine what their payment history 20 is and what have you.</p> <p>21 MS. ODOM:</p> <p>22 Q Is it your opinion that you're unable to</p>
<p>110</p> <p>1 properties, we see that when we are on the back side 2 of a raid and trying to make sure that we don't 3 admit those kinds of folks again.</p> <p>4 MS. ODOM:</p> <p>5 Q Do you have any specialized knowledge as to 6 whether undocumented tenants are more likely to 7 leave a property without giving appropriate notice 8 to the landlord?</p> <p>9 MR. deBETTENCOURT: Objection, form.</p> <p>10 A I don't think I have a strong opinion one 11 way or the other on that.</p> <p>12 MS. ODOM:</p> <p>13 Q Setting aside whether you have an opinion 14 on it, do you have any knowledge about it?</p> <p>15 MR. deBETTENCOURT: Same objection.</p> <p>16 A Our underwriting process is strict enough 17 that the rate of skips, meaning people leaving, 18 owing you money, or just disappearing in the middle 19 of the night -- the rate of skips we have is a very 20 low number. It's down in the single digits, and I 21 mean well down in the single digits, so the answer 22 is, by and large, we don't have much in the way of</p>	<p>112</p> <p>1 determine identity and payment history on an 2 undocumented immigrant?</p> <p>3 MR. deBETTENCOURT: Objection, 4 mischaracterize.</p> <p>5 THE WITNESS: I think you said it nicely.</p> <p>6 A That does mischaracterize my view a little 7 bit. What it comes down to is it's much more 8 difficult to get data because you don't know where 9 to find it and you can't do a sufficient background.</p> <p>10 MS. ODOM:</p> <p>11 Q Do you have any specialized knowledge as to 12 what information is required to pull up an 13 individual on the sex offender registry?</p> <p>14 MR. deBETTENCOURT: Objection, form.</p> <p>15 A We've talked about that earlier. It varies 16 widely by state and locality, so depending on where 17 you're operating and depending what you're trying to 18 pull, you may have to follow a different procedure.</p> <p>19 MS. ODOM:</p> <p>20 Q Do you have any specialized knowledge as to 21 whether a Social Security number is ever required, 22 no matter what state you're in, to pull up an</p>

Transcript of George C. Caruso, CPM, RAM, SHCM, HCCP

29 (113 to 116)

Conducted on December 20, 2016

	113	115
1 individual on the sex offender registry?		1 that in the conventional, non-assisted, and non-HUD
2 MR. deBETTENCOURT: Same objection.		2 context it's a reasonable practice to require proof
3 A The records I've seen are generally, among		3 of legal status as part of an application process?
4 other things, going to have that number in among a		4 A I think so.
5 bunch of other data, not least of which it will also		5 Q And why does that opinion that you just
6 have convict numbers if they've served time, but		6 gave, that you think so, apply to the conventional,
7 it's going to have other identifying data. It's		7 non-assisted, and non-HUD context?
8 going to have data of birth. And in most cases you		8 A Well, a couple reasons, Justin. Number
9 can have most of the data that's on the booking		9 one, particularly when you get into medium-sized and
10 sheet, too, plus, in a lot of instances, you're		10 larger firms, you have to be very careful to be dead
11 going to have online availability for mugshots.		11 consistent about everything you do, or else you're
12 You've got to be especially careful with sex		12 going to be facing all kinds of issues all the time.
13 offender data because the data, you can get false		13 As I said earlier, I've worked, in the last 25 years
14 positives real easily, and you don't want to accuse		14 or thereabouts, in mixed portfolio companies, where
15 someone of something that's not true, so you gotta		15 we had both unassisted and assisted, and we've
16 be really careful on vetting out those records.		16 always adopted the more restrictive set of standards
17 MS. ODOM:		17 just because it gives us the consistency and doesn't
18 Q Is a Social Security number necessary to		18 create Fair Housing problems. You've gotta -- you
19 vet those records?		19 know, you have to be very cautious in terms of how
20 MR. deBETTENCOURT: Objection, form.		20 you operate in relation to confidentiality support,
21 A Once again, since everybody does their		21 good vetting support. You want good residents and a
22 files differently, I can't tell you how important it		22 good solid community, and you need to make sure
	114	116
1 is vis-à-vis the other pieces of information without		1 everybody else is safe. So the long and short of it
2 you saying, okay, in Fairfax County what do you have		2 is I think it's part of the whole package. And it
3 to have, and then I have to go look up what I have		3 became more so when Congress made the changes and
4 to do in Fairfax County, because that's -- the		4 made it illegal to give anybody work unless they
5 process is inherently local and it varies enough		5 were here legally. So you kind of look at the broad
6 that you can't make broad generalizations about it.		6 sweep of this stuff and you say is this a -- you
7 MS. ODOM: All right, thanks, Mr. Caruso. I		7 know, is it unusual to do that. And I don't think
8 think that's it for me. I'm not sure if		8 it is. I think it's a consistent, thoughtful
9 Mr. deBettencourt has anything.		9 policy.
10 MR. deBETTENCOURT: Mr. Caruso, I do have a		10 Q Isn't it true that asking for immigration
11 couple questions. Actually, I'm going to take just a		11 documents from the U.S. government helps a landlord
12 two-minute break here.		12 verify the identity of an applicant or tenant?
13 MS. ODOM: Sure.		13 A Yeah. As a matter of fact, in most cases
14 MR. deBETTENCOURT: And then I'll have some		14 you have to get decent third-party verification, and
15 questions for you, Mr. Caruso. So we're going to		15 government documents is -- are among the gold
16 take a break and then I'll have a couple questions.		16 standards in terms of decent third-party
17 (Off the record.)		17 documentation. You might recall, I don't know, I
18 EXAMINATION BY COUNSEL FOR THE DEFENDANTS		18 guess three hours ago when we started this, Joy
19 BY MR. deBETTENCOURT:		19 mentioned, you know, can you take pay stubs. Well,
20 Q Hi Mr. Caruso, this is Justin		20 you do it, but it's a very desperate last measure
21 deBettencourt. I just have a couple questions to		21 because you want better justification than that and
22 follow up on Counsel's questions. Isn't it true		22 you want something that's a more secure document if

Conducted on December 20, 2016

117

119

1 you can get it.

2 Q Isn't it true that the U.S. government
 3 vets -- let me rephrase. Isn't it true that when a
 4 person obtains immigration documents from the U.S.
 5 government, the U.S. government vets their
 6 background?

7 MS. ODOM: Objection, foundation.

8 MR. deBETTENCOURT:

9 Q You may answer.

10 A I assume so. I don't believe they issue
 11 documents just on somebody's say-so. I'm not
 12 intimately familiar with the level of backgrounding
 13 they do, but, you know (inaudible) --

14 (At which time the court reporter requested
 15 clarification regarding the answer.)

16 THE WITNESS: Mr. deBettencourt, why don't
 17 you try asking the question again and we'll start it
 18 all over and she can just dump that section.

19 MR. deBETTENCOURT:

20 Q Isn't it true that when someone applies for
 21 immigration documents from the U.S. government, the
 22 U.S. government vets their background?

1 have an employer that's following the laws, it's

2 going to flag somebody when you put them in the
 3 E-Verify system. And that doesn't mean you don't
 4 employ them. It just means you gotta do a further
 5 investigation to determine what's going on before
 6 you, you know, banish them to Siberia, as it were.
 7 But you want to work with documents that are
 8 independently verifiable by third parties to make
 9 sure that you know where somebody is coming from.
 10 And my general sense of it is if you've got somebody
 11 that's working for someone that is openly violating
 12 a federal statute, I'm not sure I can rely on any
 13 information that person is going to give me.

14 MR. deBETTENCOURT:

15 Q Mr. Caruso, are you basing your opinions in
 16 this report on your knowledge of the industry, in
 17 addition to your own experience?

18 A Yeah. I mean, I've been part of the
 19 industry -- and as you saw my résumé, as opposing
 20 counsel saw my résumé, I've been fortunate to be
 21 elected to various positions in industry training
 22 associations over the years. Most recently I was

118

120

1 MS. ODOM: And I'll restate the objection to
 2 foundation.

3 A Based on what I know, I believe so, but I
 4 don't do those. I'm not intimate with what they do
 5 by way of background, but I know they do do
 6 background work.

7 MR. deBETTENCOURT:

8 Q Mr. Caruso, on page 1 of your report you
 9 state, any applicant who does not have legal status
 10 to work will be unable to obtain employment that can
 11 be verified as to duration and amount to permit
 12 underwriting.

13 A Yes.

14 Q Isn't it true that you base that statement
 15 on the fact that if a person does not have legal
 16 status to work, it'll be difficult for them to
 17 obtain -- difficult for them to obtain employment in
 18 the United States?

19 MS. ODOM: Objection, form.

20 A Well, we know that with the I-9
 21 requirement, and now the E-Verify requirement, you
 22 gotta have status to be able to work. And if you

1 president of the Southeastern Affordable Housing
 2 Management Association for ten years. I sit on --
 3 I'm this year's Chairman of the Institute of Real
 4 Estate Management's Federal Advocacy Board. So I
 5 hang around with a lot of people on a regular basis,
 6 because now that I'm retired, I have much more time
 7 to spend on the Hill dealing with legislative
 8 matters. So this is not just an opinion developed
 9 working inside my own church as it were. I take a
 10 more ecumenical approach, and I have a lot of
 11 friends in the industry, too, and we all work
 12 together, because, you know, as they say, if you
 13 don't hang together, you will most assuredly hang
 14 separately. I believe that was Benjamin Franklin,
 15 wasn't it?

16 Q I'm not sure. You probably know best.

17 A I think that was Franklin when the
 18 Declaration of Independence was signed. And that
 19 is, Gentlemen, if we don't hang together, we will
 20 most assuredly hang separately.

21 MR. deBETTENCOURT: All right, well, at this
 22 point I don't have any further questions.

Transcript of George C. Caruso, CPM, RAM, SHCM, HCCP

31 (121 to 124)

Conducted on December 20, 2016

<p>1 MS. ODOM: So I do have a couple questions.</p> <p>2 FURTHER EXAMINATION BY COUNSEL FOR THE PLAINTIFFS</p> <p>3 BY MS. ODOM:</p> <p>4 Q You said you base the opinions in your</p> <p>5 report on your knowledge of the industry. And I</p> <p>6 just want to clarify. There are some things about</p> <p>7 the industry that you can't or don't talk about with</p> <p>8 your friends, and one of those things --</p> <p>9 A That's true.</p> <p>10 Q One of those things is how to underwrite a</p> <p>11 lease?</p> <p>12 MR. deBETTENCOURT: Objection,</p> <p>13 mischaracterize.</p> <p>14 A One of those things -- the things I don't</p> <p>talk about with my friends most specifically is I</p> <p>don't talk about pricing, I don't talk about lease</p> <p>terms and conditions more generally. We do talk, in</p> <p>general terms, about how to underwrite a lease, but</p> <p>we don't talk in specific terms about it because</p> <p>you've got to be careful about what you do and don't</p> <p>discuss.</p> <p>22 MS. ODOM:</p>	<p>121</p> <p>1 an individual's legal status in the United States?</p> <p>2 A Since that was one of the hottest</p> <p>legislative topics when Representatives Gallegly and</p> <p>Hyde introduced the bill in the mid '90s, I probably</p> <p>spent 20 percent of my time for 18 months on those</p> <p>issues while that bill was in its gestation.</p> <p>7 Q But in recent years, in the context of</p> <p>8 having lunch with friends or having discussions with</p> <p>9 colleagues or associates in other residential</p> <p>10 management companies --</p> <p>11 (Simultaneous conversation.)</p> <p>12 A Something will occasionally --</p> <p>13 MR. deBETTENCOURT: Objection, form.</p> <p>14 A -- but I wouldn't regard it as substantive.</p> <p>15 (At which time the court reporter requested</p> <p>16 clarification regarding the answer.)</p> <p>17 A Something will occasionally pop up, but I</p> <p>wouldn't regard it as a substantive conversation.</p> <p>19 MS. ODOM:</p> <p>20 Q Meaning that you do not have substantive</p> <p>21 conversations about legal status in the United</p> <p>22 States being a prerequisite to tenancy at your</p>
<p>1 Q And some of the specific terms that you</p> <p>2 don't discuss would be prerequisites to gaining a</p> <p>3 lease at a particular property?</p> <p>4 MR. deBETTENCOURT: Same objection.</p> <p>5 A Tenant selection plans are an internal</p> <p>document I would -- I and a number of my colleagues</p> <p>are uncomfortable sharing those around, at least in</p> <p>their whole form. Occasionally we'll have comments</p> <p>on, well, what are you doing on this issue and we'll</p> <p>kick it around a little bit, but, no, that's -- I</p> <p>regard that as a proprietary business document</p> <p>inside our company and I advise my staff they're not</p> <p>allowed to share it around. We do, however -- and I</p> <p>want to put this out on the table. If an applicant</p> <p>asks us for a copy of the tenant selection plan,</p> <p>they are promptly provided one, because they are</p> <p>legally entitled to see the document and they're</p> <p>entitled to take it away. I just don't share it</p> <p>around when I'm having lunch with people.</p> <p>20 MS. ODOM:</p> <p>21 Q Do you share the details of your</p> <p>22 properties' tenant selection plans as it relates to</p>	<p>122</p> <p>124</p> <p>1 properties?</p> <p>2 MR. deBETTENCOURT: Objection, form,</p> <p>3 mischaracterize.</p> <p>4 A I've had lots of conversations over the</p> <p>years about how we're going to lobby the government</p> <p>to get regulations that we can live with. I can't</p> <p>remember having a conversation with anybody in the</p> <p>last couple of years on how I deal with an</p> <p>individual tenant.</p> <p>10 MS. ODOM:</p> <p>11 Q Or generally about what a particular</p> <p>12 property complex does by way of a policy on</p> <p>13 documented immigrants or undocumented immigrants?</p> <p>14 MR. deBETTENCOURT: Objection, form.</p> <p>15 A That would generally be fair.</p> <p>16 MS. ODOM:</p> <p>17 Q You testified a few minutes ago in response</p> <p>18 to Mr. deBettencourt's question that in the</p> <p>19 conventional, non-assisted, non-HUD space it is</p> <p>20 reasonable to have a policy that requires a</p> <p>21 prospective tenant to be legally present in the</p> <p>22 United States? Do you recall that?</p>

Transcript of George C. Caruso, CPM, RAM, SHCM, HCCP

32 (125 to 128)

Conducted on December 20, 2016

	125		127
1	MR. deBETTENCOURT: Objection,	1	thinks that's a -- you know, that knowingly housing
2	mischaracterize.	2	illegals is a good business plan. It's just not.
3	A I do.	3	Q And since you haven't heard anybody say
4	MS. ODOM:	4	anything about the fact that that would be an
5	Q Why do you think that is reasonable?	5	unreasonable thing, have you heard anything one way
6	A As I indicated in the materials that I gave	6	or the other when you're discussing this with your
7	Mr. deBettencourt, that are now part of this	7	colleagues?
8	pleadings, if they can't legally work in this	8	MR. deBETTENCOURT: Objection, form.
9	country, how are they going to earn the money to pay	9	A I'm going to answer this in an elliptic
10	their rent? You are, in most cases, granting	10	way. We've just gone through an election season
11	someone credit to the tune of somewhere between	11	that's been very divisive and immigration has been
12	15,000 and 40,000 a year, depending on the rent and	12	on the front burner for most of this period of time.
13	where the location might be, at least with regard to	13	And I'm not taking a position either way. We have a
14	my portfolio. And while I don't do mobile home	14	president. He was elected. I'm not talking about
15	parks, I do enough landlord-tenant law to know that	15	that. But immigration has popped up again as a big
16	in the event where you have that complication and	16	16 issue this year and I've had some conversations with
17	you have what's effectively a ground lease, and you	17	17 folks who say, God, it would be nice if we got this
18	have to get back possession of it, that's going to	18	18 over with and got to the point where we have some
19	be a long fight in the courts and you could lose a	19	19 standard, we weren't constantly fighting about it.
20	lot of money. So the short answer is I want to make	20	20 It's just -- it's been difficult for everybody.
21	sure that I'm doing the right job for my owners, who	21	MS. ODOM:
22	are underwriting, carefully enough, including that	22	Q Difficult for property managers?
	126		128
1	they can legally work here, that the likelihood is	1	A Yeah.
2	they'll pay their lease and they'll take their lease	2	Q Because they're on the hook to verify legal
3	to term. That's what we're after is we offer	3	status in the United States?
4	accommodation, in exchange for that they give us	4	MR. deBETTENCOURT: Objection, form.
5	money and they have the right to that space for a	5	A We're between the proverbial rock and the
6	fixed period of time, be it an apartment, a mobile	6	hard place. The rock is legal status to work,
7	home lot, a commercial building, whatever.	7	underwriting, and what have you, and the hard place
8	Q I believe you also testified you didn't	8	is Fair Housing and Equal Opportunity. And you
9	think that was an unusual policy? What is that --	9	don't want to find yourself in those two places.
10	A I don't think it's -- I don't think it's	10	10 And we have consistently, as an industry, found
11	unusual.	11	11 ourselves in that position for the last 18 months to
12	MR. deBETTENCOURT: Objection, form.	12	12 2 years, as in a adjunct to this greater policy
13	MS. ODOM:	13	13 debate about what to do about the roughly 12 million
14	Q What is that based on? What makes you say	14	14 people that are in this country that don't have a
15	that it's not unusual?	15	15 legal right to be here.
16	A In the sitting, having lunch, and	16	MS. ODOM:
17	walking-around conversations with my colleagues,	17	Q So in the absence of some federal
18	when tenant selection plans come up and there's a	18	requirement requiring a residential property company
19	question about it, I haven't heard anybody suggest	19	to verify legal status in the United States, it's
20	that having a citizenship -- you know, having --	20	easier if that company doesn't verify legal status?
21	21 being here illegally -- citizenship is the wrong	21	Would that be a fair statement?
22	22 term. Being here illegally, I don't know if anybody	22	MR. deBETTENCOURT: Objection, form.

Transcript of George C. Caruso, CPM, RAM, SHCM, HCCP

33 (129 to 132)

Conducted on December 20, 2016

129

1 A I'm not sure I would concur with that
2 formulation of it, no.

3 MS. ODOM:

4 Q What about that formulation of it do you
5 not concur with?

6 A Well, we touched on this, I think, half a
7 dozen times, and I've tried to be consistent about
8 it, but what it boils down to is when we're leasing
9 stuff, the rent has to get paid. And if they can't
10 be legally employed, how do you assure yourself that
11 the rent is going to get paid.

12 MS. ODOM: All right, I think that's it for
13 me, Mr. Caruso. Thanks for your time.

14 THE WITNESS: Well, on that note --

15 MR. deBETTENCOURT: That's it for me, too,
16 Mr. Caruso. Have a good vacation.

17 (Off the record at 3:35 p.m.)

18

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130

1 CERTIFICATE OF SHORTHAND REPORTER-NOTARY REPUBLIC
2

3 I, LISA KIRK, the officer before whom the
4 foregoing deposition was taken, do hereby certify
5 that the foregoing transcript is a true and correct
6 record of the testimony given; that said testimony
7 was taken by me stenographically and thereafter
8 reduced to typewriting under my direction; that
9 reading and signing was not requested; and that I am
10 neither counsel for, related to, nor employed by any
11 of the parties to this case and have no interest,
12 financial or otherwise, in its outcome.

13 IN WITNESS WHEREOF, I have hereunto set my
14 hand and affixed my notarial seal this 4th day of
15 January, 2017.

16 My commission expires:

17 July 31, 2018

18



19 _____
20 NOTARY PUBLIC IN AND FOR

21 THE COMMONWEALTH OF VIRGINIA

22 Notary Registration Number - 7057881

Transcript of George C. Caruso, CPM, RAM, SHCM, HCCP

Conducted on December 20, 2016

34

A			
a-plus	114:6, 115:11, 121:6, 121:7, 121:15, 121:16, 121:18, 121:19, 121:20, 123:21, 124:5, 124:11, 126:19, 127:4, 127:14, 127:19, 128:13, 129:4, 129:7	acts 73:6 actually 12:18, 54:12, 65:22, 88:17, 99:22, 114:11 add 66:20 addition 25:14, 119:17 addresses 74:17 adjunct 128:12 administrations 16:3 administrative 67:13 admission 92:16, 92:18 admissions 12:10, 12:15, 31:10 admit 108:8, 110:3 admits 111:2 adopt 23:6, 28:20, 91:5 adopted 23:21, 92:17, 115:16 adopting 18:22 adult 50:3, 81:3, 81:11, 84:21, 88:1, 88:3, 88:4, 88:6, 88:15, 88:16, 90:17 adults 92:12, 92:13 advisable 96:12 advisably 37:11	advise 122:12 advocacy 120:4 affirmed 6:18 affixed 130:14 affordable 15:5, 15:21, 16:4, 17:14, 18:1, 18:13, 18:20, 23:5, 120:1 after 14:17, 22:15, 36:17, 69:4, 82:11, 126:3 again 22:12, 43:20, 49:4, 52:19, 64:11, 71:22, 78:20, 87:6, 87:22, 88:1, 89:6, 92:20, 99:8, 110:3, 113:21, 117:17, 127:15 against 17:7, 17:9, 27:9, 41:2, 61:22, 80:15, 89:7, 92:17 age 81:12, 82:8, 87:18 agencies 11:12, 27:22, 106:6, 108:1 agency 29:17, 30:7, 42:1, 46:8, 56:13, 100:11, 100:12, 100:13 agenda 22:13 ago 8:9, 23:9,
able	23:14, 23:15, 24:6, 33:8, 34:16, 49:15, 49:20, 51:12, 53:5, 62:3, 63:8, 63:14, 65:1, 72:17, 78:1, 79:4, 86:11, 95:12, 98:19, 99:10, 109:16, 111:19, 118:22		
able-bodied	86:9		
about	9:5, 9:11, 14:17, 19:10, 19:11, 20:7, 20:9, 23:9, 23:10, 26:19, 28:17, 29:4, 29:5, 29:11, 30:10, 33:17, 38:4, 38:15, 38:18, 41:12, 42:14, 47:2, 54:8, 58:18, 60:16, 65:7, 67:16, 68:3, 71:10, 79:5, 82:12, 82:16, 82:18, 82:19, 83:6, 83:21, 84:12, 85:6, 89:4, 92:20, 92:21, 95:12, 95:17, 96:18, 96:21, 96:22, 97:18, 103:14, 106:9, 108:18, 110:14, 112:15,		
	104:12, 105:19		

Transcript of George C. Caruso, CPM, RAM, SHCM, HCCP

Conducted on December 20, 2016

35

47:20, 70:5, 80:2, 116:18, 124:17 agree 29:1, 29:6 agreed 6:13 agreement 46:5, 46:10 agrees 6:10 agricultural 13:22 agriculture 16:2 ahead 6:5, 6:14, 11:4, 21:11, 21:14, 24:14, 27:3, 32:18, 45:11, 53:2, 60:1, 61:14, 71:3, 88:21, 91:12, 94:6 aid 3:11 aimco 39:22, 44:4, 45:19 aimed 18:4 al 1:5, 1:9 alabama 14:18 alco 15:1 alexandria 1:3 algorithm 79:8 algorithms 79:11, 80:6 alien 50:5 alive 16:13 all 6:4, 7:1, 7:10,	7:17, 7:20, 8:18, 9:16, 13:1, 16:4, 18:3, 18:18, 20:13, 21:22, 24:2, 24:7, 25:17, 26:17, 27:16, 32:13, 34:14, 34:16, 38:1, 41:20, 43:14, 46:12, 48:21, 51:18, 52:8, 53:8, 54:18, 58:14, 61:22, 70:10, 70:12, 73:11, 74:18, 77:10, 78:20, 79:9, 80:5, 82:7, 89:16, 89:22, 90:2, 90:7, 92:12, 92:13, 96:2, 97:13, 100:14, 102:7, 103:8, 103:22, 104:11, 106:6, 114:7, 115:12, 117:18, 120:11, 120:21, 129:12 allow 54:14 allowed 122:13 allows 107:13 almost 60:5, 86:17 alongside 87:16 already 7:21, 37:16, 52:19 also 9:20, 13:22, 15:14, 18:16, 23:17, 27:13, 45:4, 55:18, 58:1, 64:9,	66:6, 74:10, 76:4, 78:14, 87:12, 92:14, 98:4, 98:10, 101:13, 107:8, 113:5, 126:8 alternate 61:19, 61:21 alternative 71:14 always 47:14, 47:19, 92:6, 97:10, 115:16 american 14:13 among 10:9, 98:3, 102:2, 104:13, 107:22, 113:3, 113:4, 116:15 amount 65:21, 118:11 amounts 71:16, 72:5, 72:18 annual 11:11, 19:2, 67:18, 93:3 another 41:3, 53:19, 80:19, 88:4, 88:6, 105:6 answer 8:7, 8:8, 20:19, 21:14, 21:15, 24:14, 27:3, 32:8, 32:9, 33:6, 33:8, 33:10, 35:9, 35:13, 35:16, 35:19, 36:5, 43:2, 43:16, 45:11, 46:20, 46:21, 47:9, 53:5, 53:6, 53:7, 58:12, 59:4,	60:1, 62:15, 63:3, 66:4, 79:9, 82:4, 82:13, 83:19, 86:2, 89:2, 89:5, 90:5, 90:14, 94:9, 94:10, 94:11, 94:13, 95:3, 95:8, 98:19, 98:21, 99:9, 99:11, 102:16, 103:6, 103:10, 104:22, 105:4, 105:15, 107:12, 107:19, 110:21, 111:17, 117:9, 117:15, 123:16, 125:20, 127:9 answered 24:12, 35:12, 62:17, 103:4 antitrust 82:11, 82:19 any 7:11, 8:14, 9:5, 11:21, 12:1, 16:7, 18:6, 19:13, 21:6, 25:2, 26:21, 28:4, 28:5, 33:1, 33:13, 33:20, 35:9, 35:16, 36:6, 38:5, 38:14, 39:15, 41:22, 42:1, 46:18, 46:22, 54:21, 56:5, 65:6, 65:18, 67:22, 69:6, 70:21, 77:14, 81:22, 83:11, 88:10, 94:8, 98:22, 99:14, 99:15, 100:11, 102:10, 102:13, 103:19, 104:4,
--	--	--	---

Transcript of George C. Caruso, CPM, RAM, SHCM, HCCP

Conducted on December 20, 2016

36

105:5, 105:13, 105:22, 106:9, 106:11, 106:12, 106:18, 106:22, 107:19, 108:22, 110:5, 110:14, 111:7, 111:8, 111:10, 112:11, 112:20, 118:9, 119:12, 120:22, 130:10	applicants 31:7, 86:8 application 31:11, 39:6, 51:1, 55:13, 56:3, 57:10, 63:7, 69:11, 73:10, 88:16, 111:14, 115:3 applications 77:4, 107:4 applies 60:7, 85:17, 87:16, 98:21, 101:5, 117:20 apply 84:3, 115:6 applying 28:4 approach 44:19, 44:20, 120:10 appropriate 55:22, 57:12, 57:13, 94:3, 110:7 appropriately 25:14 appropriations 19:2 approve 63:2 april 9:17 area 18:5, 54:17 aren't 41:13 arena 67:1 arisen 38:6 around 13:3, 24:3, 28:13, 52:18, 73:4, 120:5, 122:7, 122:10, 122:13, 122:19	arrangement 46:7 arrest 37:12, 108:1, 108:2 arrested 37:16 art 48:9 articles 65:7 ascertain 25:16, 70:19 aside 39:13, 39:15, 64:8, 110:13 asked 7:5, 24:11, 33:16, 35:9, 35:11, 35:16, 36:6, 94:1, 95:3, 103:3 asking 24:3, 32:11, 32:13, 35:14, 36:3, 44:16, 72:7, 104:1, 116:10, 117:17 asks 122:15 aspect 26:2 assaulting 104:17 assess 69:7, 84:7 assessment 72:12 asset 9:11, 9:20, 9:22 assets 13:16, 13:18, 47:11, 48:10, 71:19, 72:4, 102:19 assistance 19:2, 23:21,	40:12, 40:17, 41:14, 44:6, 45:6, 45:12, 45:16, 46:18, 48:5, 48:7, 68:11, 85:14, 97:22, 99:14 assistant 69:3, 107:12 assisted 15:10, 15:14, 19:11, 19:12, 19:22, 22:17, 23:5, 23:8, 67:1, 67:10, 85:4, 91:4, 91:13, 91:15, 91:16, 115:15 associates 123:9 association 15:6, 15:21, 16:6, 120:2 associations 119:22 assume 46:21, 87:21, 117:10 assuming 48:15 assumption 47:4 assurance 52:14, 52:16 assure 58:3, 129:10 assuredly 120:13, 120:20 attached 5:10, 6:2, 21:4 attachés 64:9 attending 64:14 attention 68:21 attorney 69:3
--	---	--	--

Transcript of George C. Caruso, CPM, RAM, SHCM, HCCP

Conducted on December 20, 2016

37

attorneys 37:11, 107:13	118:5, 118:6	10:14, 22:8, backgrounding 23:1, 25:19, 27:6, 27:8, backgrounds 29:18, 37:18, 40:13, 40:16, backup 45:1, 45:19, 49:4, 51:18, bad 57:14, 57:21, 58:2, 60:6, 104:12, 105:17, 105:19	86:16, 92:6, 92:11, 96:18, 99:6, 101:21, 104:8, 106:7, 107:7, 109:18, 119:18, 119:20, 127:11, 127:20 before 2:19, 7:2, 7:19, 7:21, 8:6, 12:13, 47:13, 52:20, 65:14, 71:9, 92:22, 100:19, 119:5, 130:3
attribute 111:1	banish 66:17	67:6, 68:9, 70:20, 74:2, 74:22, 75:3, 76:10, 77:3, 78:5, 78:19, 79:9, 82:7, 82:15, 86:16, 87:4, 91:20, 92:15, 93:4, 93:12, 93:14, 96:12, 97:17, 103:7, 104:14, 107:6, 109:2, 111:7, 112:8, 113:13, 114:4, 115:17, 116:21, 120:6, 120:12, 121:19, 122:16, 128:2	12:13, 47:13, 52:20, 65:14, 71:9, 92:22, 100:19, 119:5, 130:3
august 13:9	bank 76:2, 76:4	78:5, 78:19, 79:9, 82:7, 82:15, 86:16, 87:4, 91:20, 92:15, 93:4, 93:12, 93:14, 96:12, 97:17, 103:7, 104:14, 107:6, 109:2, 111:7, 112:8, 113:13, 114:4, 115:17, 116:21, 120:6, 120:12, 121:19, 122:16, 128:2	begin 93:14
authority 40:18	banking 76:4	128:2	beginning 44:11
automated 80:9	base 82:21	103:7, 104:14, 107:6, 109:2, 111:7, 112:8, 113:13, 114:4, 115:17, 116:21, 120:6, 120:12, 121:19, 122:16, 128:2	behalf 3:2, 4:2
automatically 77:4	based 56:22, 67:13, 80:8, 96:7, 118:3, 126:14	128:2	behavior 82:20, 105:17, 106:8, 107:10
automobiles 109:7	basic 96:2, 106:21	103:7, 104:14, 107:6, 109:2, 111:7, 112:8, 113:13, 114:4, 115:17, 116:21, 120:6, 120:12, 121:19, 122:16, 128:2	being 6:10, 6:18, 8:2, 17:9, 22:12, 22:13, 29:19, 31:6, 49:16, 50:1, 60:9, 60:20, 84:15, 91:19, 123:22, 126:21, 126:22
availability 113:11	basically 10:6, 19:20	103:7, 104:14, 107:6, 109:2, 111:7, 112:8, 113:13, 114:4, 115:17, 116:21, 120:6, 120:12, 121:19, 122:16, 128:2	believe 26:10, 40:21, 95:22, 96:4, 104:5, 117:10, 118:3, 120:14, 126:8
available 32:14, 72:4, 72:18	basing 119:15	103:7, 104:14, 107:6, 109:2, 111:7, 112:8, 113:13, 114:4, 115:17, 116:21, 120:6, 120:12, 121:19, 122:16, 128:2	below 18:4
avoid 82:14, 83:4	basis 45:15, 49:14, 57:17, 65:17, 67:19, 81:19, 94:11, 95:7, 107:2, 120:5	103:7, 104:14, 107:6, 109:2, 111:7, 112:8, 113:13, 114:4, 115:17, 116:21, 120:6, 120:12, 121:19, 122:16, 128:2	beneath 48:2
avoided 83:2	bear 87:11	103:7, 104:14, 107:6, 109:2, 111:7, 112:8, 113:13, 114:4, 115:17, 116:21, 120:6, 120:12, 121:19, 122:16, 128:2	beneficiaries 13:15
aware 8:15, 8:17, 36:9, 49:10, 56:16, 60:19, 74:12, 81:22, 111:5	bearing 76:22	103:7, 104:14, 107:6, 109:2, 111:7, 112:8, 113:13, 114:4, 115:17, 116:21, 120:6, 120:12, 121:19, 122:16, 128:2	benjamin 120:14
away 122:18	beating 104:1	103:7, 104:14, 107:6, 109:2, 111:7, 112:8, 113:13, 114:4, 115:17, 116:21, 120:6, 120:12, 121:19, 122:16, 128:2	
B			
back 8:1, 8:22, 21:2, 44:2, 47:21, 59:6, 71:6, 76:3, 76:8, 76:10, 78:21, 79:18, 79:22, 95:2, 110:1, 125:18	bear 87:11	103:7, 104:14, 107:6, 109:2, 111:7, 112:8, 113:13, 114:4, 115:17, 116:21, 120:6, 120:12, 121:19, 122:16, 128:2	
back-office 76:5	bearing 76:22	103:7, 104:14, 107:6, 109:2, 111:7, 112:8, 113:13, 114:4, 115:17, 116:21, 120:6, 120:12, 121:19, 122:16, 128:2	
background 63:11, 76:13, 76:21, 112:9, 117:6, 117:22,	beating 104:1	103:7, 104:14, 107:6, 109:2, 111:7, 112:8, 113:13, 114:4, 115:17, 116:21, 120:6, 120:12, 121:19, 122:16, 128:2	
	became 14:7, 37:13, 65:15, 96:21, 116:3	103:7, 104:14, 107:6, 109:2, 111:7, 112:8, 113:13, 114:4, 115:17, 116:21, 120:6, 120:12, 121:19, 122:16, 128:2	
	because 8:4, 9:15,	103:7, 104:14, 107:6, 109:2, 111:7, 112:8, 113:13, 114:4, 115:17, 116:21, 120:6, 120:12, 121:19, 122:16, 128:2	

Transcript of George C. Caruso, CPM, RAM, SHCM, HCCP

Conducted on December 20, 2016

38

besides 33:13	block 99:17	budgets 101:16	came 25:11, 82:11,
best 8:4, 8:16, 38:22, 120:16	board 12:8, 91:6, 120:4	builder 14:21	93:16, 95:16, 100:16
better 17:11, 27:5, 49:18, 116:21	boils 129:8	building 15:13, 126:7	camera 9:4, 34:10
betting 41:11	book 12:20	buildings 75:22	can't 8:15, 24:19,
between 13:3, 15:11, 33:5, 42:5, 60:16, 74:14, 95:7, 105:18, 125:11, 128:5	booking 113:9	built 77:2	25:18, 27:8, 28:16, 34:11,
beyond 7:10, 76:19	books 73:8	bunch 113:5	34:13, 36:16, 36:22, 38:1,
bidding 12:11	bookshelf 20:7	burner 127:12	43:2, 46:20, 58:4, 63:22,
big 9:19, 61:8, 61:11, 75:17, 79:10, 80:6, 82:8, 127:15	borrowed 29:16	bush 52:18	65:11, 67:22, 68:6, 79:9,
bill 97:11, 97:16, 97:17, 98:18, 123:4, 123:6	both 19:20, 23:5, 28:15, 29:21, 88:19, 90:20, 107:4, 115:15	business 14:8, 18:20, 20:10, 23:20, 31:22, 40:17, 41:14, 55:2, 79:17, 82:12, 83:13, 90:20, 91:14, 101:12, 122:11, 127:2	80:17, 97:18, 99:9, 101:8, 102:16, 109:15, 112:9, 113:22, 114:6, 121:7, 124:6, 125:8, 129:9
bills 16:15, 22:10, 22:11, 65:14	bottom 104:15	business; 31:16	capacity 21:22, 107:1
birth 74:2, 75:2, 78:14, 113:8	box 61:8, 61:11, 79:12, 80:10, 80:11	buying 103:9	capital 11:8, 14:13
bit 8:3, 17:18, 27:6, 77:5, 104:4, 112:7, 122:10	break 52:2, 58:15, 71:4, 71:9, 94:21, 114:12, 114:16	by: 1:22	caption 34:9
black 79:12, 80:10, 80:11, 109:4	breaking 66:1	<hr/> C <hr/>	card 37:22, 55:17, 56:2, 70:8, 70:19, 80:4
blank 53:18	brief 71:9	calculation 9:10	cards 55:17, 55:19
blend 74:18	broad 16:3, 20:1, 55:19, 102:12, 114:6, 116:5	call 10:4, 23:4, 28:14, 35:17, 71:5	care 22:9, 72:15
blessed 104:9	broader 12:18	called 20:6, 41:14, 44:5, 46:5, 48:9, 80:2, 81:6, 97:6, 97:11	career 14:2, 21:17, 22:8, 41:11, 67:7, 83:8, 101:10, 102:9
	brought 60:20, 65:13	calls 32:7, 33:4, 53:4, 94:8, 95:6	career-changing 102:10
	budget 10:5		career; 96:8
	budgeting 11:11, 101:22		careers 82:13, 96:17

Transcript of George C. Caruso, CPM, RAM, SHCM, HCCP

Conducted on December 20, 2016

39

careful 22:4, 60:12, 60:16, 89:4, 96:18, 111:2, 113:12, 113:16, 115:10, 121:20	108:6, 113:8, 116:13, 125:10	103:16 checking 56:22, 66:17, 74:20	clear 25:12, 26:4, 32:11, 33:19, 35:3, 35:7, 102:7
carefully 21:18, 85:3, 86:16, 86:21, 125:22	99:18	checks 63:11, 76:13, 80:1, 80:16, 103:8	clearly 39:11
carry 73:4	center 3:11	chicago 14:8, 14:10, 15:14	click 51:19
caruso 1:15, 2:1, 5:2, 5:11, 6:1, 6:4, 6:10, 6:17, 7:1, 33:8, 33:10, 34:17, 36:1, 51:11, 52:21, 83:16, 88:20, 94:4, 95:14, 103:13, 104:7, 105:22, 114:7, 114:10, 114:15, 114:20, 118:8, 119:15, 129:13, 129:16	certain 82:8	chief 12:22	clickety 51:19
caruso's 34:20	certainly 16:10	child 87:17, 87:18, 87:20, 88:1, 88:3	client 76:9
case 7:15, 7:16, 22:20, 23:18, 25:7, 33:21, 34:2, 35:4, 36:6, 37:5, 37:9, 49:16, 54:11, 59:2, 63:13, 69:4, 79:21, 84:15, 88:16, 89:15, 91:9, 93:19, 94:17, 108:11, 108:12, 130:11	certainty 24:20	chip 70:16	clients 9:19
cases 12:3, 14:22, 19:20, 37:1, 68:14, 71:18, 81:5, 108:3,	certificate 130:1	chosen 91:5	close 70:8
	certifications 41:6	church 3:14, 120:9	coast 14:12
	certify 130:4	circumstance 31:3, 37:6, 92:15	code 20:5
	cfr 20:6	cis 59:12	coincidentally 108:5
	chairman 97:12, 120:3	citizen 39:4, 50:4, 71:22	colleague 103:16
	challenge 84:14	citizens 64:13, 68:3, 106:3	colleagues 23:20, 39:17, 39:19, 76:1, 82:6, 101:14, 101:18, 101:22, 106:20, 111:9, 122:6, 123:9, 126:17, 127:7
	challenged 49:16, 49:21, 50:2	citizenship 16:14, 126:20, 126:21	collect 81:20, 89:7, 108:16
	change 12:4, 59:5, 92:7, 92:12	civil 1:12, 41:2, 41:16	colloquially 97:6
	changed 69:19, 93:4	claim 91:16	collusion 68:8
	changes 116:3	clarification 20:19, 43:16, 105:15, 117:15, 123:16	collusive 82:20
	chapter 20:6	clarify 121:6	columbia 37:12, 107:9
	charge 12:5		combatting 107:15
	check 20:13, 20:20, 45:14, 45:20, 46:19, 76:21, 79:15, 80:14, 97:9, 97:22,		come 13:17, 21:2,

Transcript of George C. Caruso, CPM, RAM, SHCM, HCCP

Conducted on December 20, 2016

40

22:6, 31:8, 31:12, 36:8, 49:4, 53:8, 57:21, 68:21, 75:1, 126:18 comes 19:17, 41:9, 83:7, 83:9, 93:3, 104:22, 112:7 coming 13:4, 86:19, 119:9 comments 122:8 commercial 21:18, 42:17, 74:3, 74:12, 126:7 commission 130:16 committee 97:12 commonwealth 2:23, 130:21 communications 32:7, 33:5, 53:4, 53:6, 94:8, 95:7, 95:17 communities 10:19, 107:21 community 42:15, 42:21, 44:4, 45:16, 45:18, 99:16, 103:21, 115:22 companies 28:18, 41:13, 56:15, 57:7, 82:1, 82:9, 96:14, 101:9, 115:14, 123:10 company 14:18, 23:4, 28:14, 52:11, 75:14, 77:15, 77:20, 79:8,	102:4, 102:11, 103:9, 122:12, 128:18, 128:20 comparatively 67:21 compare 78:20 compensated 13:13 competitors 76:17 complaint 31:5, 31:8, 31:15, 49:3, 93:19, 93:22 complaints 38:14, 107:17 complete 50:10, 50:14, 62:3 completely 53:14 complex 46:12, 47:22, 48:17, 48:18, 54:18, 124:12 complexes 14:1, 85:13 complexly 47:13 compliance 99:20 complication 125:16 comply 20:14, 21:1, 40:13, 43:10, 46:12, 85:8 complying 40:19, 100:20 components 12:19 compositions 85:7 compound 75:10 concern 30:22, 47:5	concerned 17:11, 29:4, 29:5, 29:11, 29:16, 30:8, 31:4, 38:19 concur 129:1, 129:5 conditions 86:13, 121:17 condominiums 21:16 confidential 102:8 confidentiality 115:20 confines 38:6 confirm 36:4 confirmation 57:2 congress 16:2, 22:9, 22:16, 25:12, 26:3, 116:3 congressional 26:18, 47:15 connects 98:12 consequence 37:18 consider 39:10, 39:11, 39:18, 39:19, 39:21, 40:1, 91:12 consideration 104:20 considerations 104:20 considered 102:8 consist 10:17, 56:19 consistency 115:17 consistent 31:10, 44:18,	44:20, 47:16, 49:6, 90:20, 92:17, 115:11, 116:8, 129:7 consistently 23:2, 23:7, 47:18, 73:17, 128:10 constantly 127:19 contact 36:8 contained 93:21 containing 61:11 context 17:21, 47:18, 111:4, 115:2, 115:7, 123:7 contexts 64:21 continue 73:9, 104:6 continuously 13:4 contours 91:8 contracting 12:12 contractor 60:9, 60:13, 60:21 contractors 11:10 contracts 41:7 contractual 46:6, 46:10 contribution 87:5 control 17:10, 83:10 conundrum 72:20 convenient 103:7 conventional 23:5, 85:3,
---	---	--	---

Transcript of George C. Caruso, CPM, RAM, SHCM, HCCP

Conducted on December 20, 2016

41

91:4, 115:1, 115:6, 124:19 conversation 69:2, 105:10, 123:11, 123:18, 124:7 conversations 32:20, 82:6, 82:14, 83:21, 106:19, 111:8, 123:21, 124:4, 126:17, 127:16 convict 113:6 copy 8:20, 122:15 corelogic 76:18 corollary 109:2 corporate 7:18 corporation 9:19, 10:11, 14:14, 100:7 correct 27:18, 30:15, 46:2, 46:15, 96:5, 96:10, 130:5 correctly 40:18 correlation 109:8 cost 20:21, 45:18 costs 19:3, 45:15, 45:21 could 49:17, 49:18, 51:7, 54:18, 55:14, 74:9, 80:3, 87:11, 125:19 counsel 6:21, 32:1, 32:7, 32:12,	33:5, 53:4, 53:7, 53:9, 90:15, 94:8, 95:7, 95:17, 114:18, 119:20, 121:2, 130:10 counsel's 35:8, 35:15, 36:5, 36:7, 114:22 counselor 103:22 country 18:14, 25:13, 28:1, 50:3, 50:6, 59:9, 64:12, 125:9, 128:14 county 114:2, 114:4 couple 37:1, 68:1, 76:22, 85:16, 114:11, 114:16, 114:21, 115:8, 121:1, 124:8 course 18:19 court 1:1, 2:21, 6:5, 6:14, 8:4, 8:11, 20:18, 43:15, 58:5, 89:13, 105:14, 108:4, 117:14, 123:15 courtroom 6:8 courts 125:19 cover 20:21, 45:15, 45:21, 71:15, 87:11 covered 18:2 covers 55:19 crack 49:19	crazy 51:8, 100:18 create 115:18 creating 12:5, 33:14 creation 12:1 credit 74:15, 74:16, 79:15, 80:1, 80:14, 80:16, 125:11 crime 106:1, 107:4, 107:15 crimes 106:5 criminal 74:20, 75:9, 76:21, 106:8, 107:10, 109:11 criteria 91:19 current 38:20, 39:2, 62:9 currently 76:12 customary 57:6 customer 79:11 customize 77:9 customized 77:11 customs 70:9 cut 89:20, 90:21, 92:3 cuts 29:17	dangerous 103:20, 104:5 data 78:22, 95:15, 106:17, 106:18, 107:8, 107:18, 107:22, 108:17, 108:22, 111:7, 112:8, 113:5, 113:7, 113:8, 113:9, 113:13 database 75:12, 78:7 databases 74:3 date 74:2, 78:14 dates 75:2 day 130:14 day-to-day 10:20, 11:5, 11:20, 61:21 days 13:2, 20:2, 21:3, 66:16, 79:9, 79:19, 80:5 de 1:5 dead 115:10 deal 19:19, 19:22, 97:13, 99:13, 124:8 dealing 54:16, 68:14, 71:18, 71:21, 104:15, 120:7 deals 43:5, 47:12, 100:15 debate 128:13 debettencourt 4:3, 5:4, 6:9,
--	--	--	--

Transcript of George C. Caruso, CPM, RAM, SHCM, HCCP

Conducted on December 20, 2016

42

114:9, 114:21, 117:16, 125:7 debettencourt's 124:18 december 1:17 decent 116:14, 116:16 decision 100:17 decisions 107:7 declaration 120:18 declaring 87:4 decline 100:1 deemed 82:19 deep 19:1, 23:21, 40:12, 40:16, 41:14, 44:6, 45:6, 45:12, 45:16, 46:18, 48:5, 48:7, 63:17, 68:10, 97:22 deeply 17:11 deeply-assisted 19:4 defendants 1:10, 51:4, 52:10, 114:18 defendants' 52:9 defendants: 4:2 definition 17:17, 25:20, 60:13 deliberately 68:11 demonstrate 62:20, 72:17 demonstrating 108:7	department 16:1, 16:2, 57:18, 57:22, 67:5, 82:11 depending 17:16, 50:11, 74:11, 112:16, 112:17, 125:12 depends 54:11, 75:11, 75:12 deposed 7:2, 7:9, 7:20 deposition 1:15, 2:1, 5:11, 7:6, 7:10, 130:4 depositions 7:11 describe 49:15, 49:17, 49:20 described 48:17 describing 99:7 design 75:12 designators 77:2 desperate 116:20 details 88:13, 122:21 determine 25:6, 61:17, 73:12, 74:6, 111:19, 112:1, 119:5 deterring 16:18 developed 68:7, 120:8 development 99:16 difference 60:19 different 14:1, 19:13,	23:12, 48:2, 48:6, 54:15, 57:20, 70:3, 77:5, 89:15, 93:4, 98:11, 104:4, 108:13, 112:18 differentiated 104:13 differentiation 42:19, 60:15 differently 44:12, 44:17, 113:22 difficult 8:3, 14:4, 25:21, 69:19, 111:11, 112:8, 118:16, 118:17, 127:20, 127:22 digits 110:20, 110:21 diligence 56:5 diplomacy 64:21 diplomat 58:5 diplomatic 58:2 diplomats 57:19, 64:5, 64:8, 64:18 direction; 130:8 directly 21:20, 70:7 director 15:4, 15:20 disability 86:11 disabled 86:10, 86:18, 87:1 disappearing 110:18 discover 67:9	discuss 82:22, 95:15, 96:13, 121:21, 122:2 discussed 8:9, 96:1, 101:22 discusses 111:13 discussing 44:3, 82:12, 87:7, 88:14, 127:6 discussion 102:10 discussions 84:12, 96:17, 123:8 disparate 91:3, 91:16 disparately 31:6 distributing 108:10, 108:11, 108:12, 109:6 district 1:1, 1:2, 37:11, 40:3, 107:9, 108:11, 108:14 disturbance 38:5 diversified 14:13 division 1:3, 18:16, 23:3 divisive 127:11 divorce 27:7 document 34:1, 34:3, 35:4, 46:4, 50:12, 54:13, 69:7, 69:14, 69:18, 116:22, 122:6, 122:11,
--	---	---	---

Transcript of George C. Caruso, CPM, RAM, SHCM, HCCP

Conducted on December 20, 2016

43

122:17	19:8, 23:13,	102:14	75:20, 75:21,
documentation	27:5, 31:13,	E	76:12, 84:20,
56:10, 56:11,	42:13, 44:2,	e-verify	85:21, 88:14,
56:12, 56:15,	51:7, 88:2,	59:8, 59:11,	90:6, 91:22,
56:17, 64:12,	98:18, 104:22,	59:12, 59:14,	93:9, 93:12,
69:12, 116:17	110:20, 110:21,	59:16, 59:20,	103:12, 107:21,
documented	112:7, 129:8	60:4, 60:22,	111:4
103:21, 105:7,	downside	61:15, 62:7,	education
106:3, 108:20,	51:16, 67:3	118:21, 119:3	106:9, 109:19
124:13	dozen	each	effect
documents	129:7	8:2, 22:18,	53:21
17:7, 17:12,	draft	40:6, 70:9,	effectively
33:1, 33:20,	12:15	81:12	54:1, 107:16,
35:9, 35:17,	drafting	earlier	125:17
36:6, 37:14,	13:1	24:16, 58:19,	efforts
37:19, 37:21,	drafts	64:6, 68:15,	108:16
41:7, 43:20,	12:3	96:4, 96:16,	either
50:8, 50:11,	drills	112:15, 115:13	20:20, 29:17,
50:22, 55:9,	61:22	early	41:18, 45:13,
55:19, 55:20,	drive	16:15, 22:6,	54:13, 59:7,
68:17, 68:22,	14:11, 100:18	22:7, 22:8,	68:7, 68:8,
69:10, 70:13,	driven	22:11, 22:16,	71:19, 77:17,
70:16, 84:2,	79:10	26:4, 65:13	88:11, 107:20,
100:1, 100:2,	driver's	earn	127:13
116:11, 116:15,	70:2, 70:3	125:9	elected
117:4, 117:11,	drives	earning	119:21, 127:14
117:21, 119:7	55:9	109:4	election
doing	driving	easier	127:10
7:7, 15:7,	70:4	60:6, 97:17,	electronic
23:5, 23:21,	drug	128:20	59:12, 59:15,
27:6, 47:17,	38:10	easily	66:16, 70:15
48:11, 48:12,	drugs	76:11, 113:14	element
66:19, 67:8,	104:15, 107:15,	eastern	29:22, 30:4
76:1, 79:17,	108:10, 109:6,	1:2	elements
100:15, 122:9,	109:22	economy	29:22, 78:22,
125:21	due	109:4	96:2
doj	67:11, 103:22	ecumenical	eligible
69:8	duly	120:10	27:15
done	6:18	edgewood	elliptic
21:15, 21:17,	dump	10:10, 10:11,	127:9
33:18, 40:10,	117:18	10:14, 12:9,	elliptical
53:9, 53:14,	duration	12:20, 13:8,	82:5, 104:22
80:5, 102:5,	65:21, 66:7,	15:8, 19:10,	else
103:14	86:3, 118:11	36:10, 44:5,	10:22, 29:5,
doors	during	45:5, 45:20,	56:21, 66:3,
10:21	14:15	55:12, 56:2,	83:12, 115:11,
down	dwoskin	57:9, 75:19,	116:1
8:5, 15:9,	52:10, 98:22,		elton
			16:14

Transcript of George C. Caruso, CPM, RAM, SHCM, HCCP

Conducted on December 20, 2016

44

emanuel 3:4	118:10, 118:17	44:14, 45:19, 47:5, 47:12, 47:22, 48:1, 48:22, 76:13, 84:1, 84:2, 84:7, 100:8	everybody 24:4, 60:5, 81:20, 89:7, 89:13, 89:22, 93:17, 102:12, 113:21, 116:1, 127:20
embarrass 82:10	66:5	47:22, 48:1, 48:22, 76:13, 84:1, 84:2, 84:7, 100:8	everyone 49:7, 50:2
emerge 68:17	64:1	equal 128:8	everything 7:8, 15:3, 15:9, 15:10, 24:21, 41:11, 55:8, 100:21, 115:11
emerged 39:1, 92:22	54:9, 108:17	equation 30:1	everywhere 44:21, 49:7
emphasize 73:9	enables 54:1	equity 39:19, 48:10	exactly 50:18, 72:21, 79:12, 82:21
emphasized 73:8	enacted 25:16	especially 113:12	examination 5:2, 6:21, 114:18, 121:2
empirical 106:14, 106:17	encountered 64:20	esquire 3:3, 3:10, 4:3	examined 6:20
employ 119:4	end 67:7, 76:10, 80:3, 96:17	essentially 42:15, 67:12	example 33:19, 60:10, 69:8, 85:21, 89:16, 108:19
employed 13:7, 55:22, 65:2, 85:20, 87:10, 129:10, 130:10	ended 37:15, 37:17	estate 15:22, 16:6, 120:4	exceedingly 25:15, 54:18
employee 60:8, 60:15	enforcing 13:1	estimate 19:5	except 43:17
employees 25:17	engaged 109:10	et 1:5, 1:9	exchange 126:4
employer 7:19, 56:13, 56:14, 57:3, 59:19, 60:7, 60:21, 66:5, 68:2, 68:8, 119:1	engaging 42:15, 98:9	evaluations 107:4	excited 53:11
employers 25:16, 56:14, 66:13	engineers 11:9	even 48:19, 55:18, 79:11, 87:17, 88:14, 89:10, 89:17, 106:21	exclude 24:8, 41:19, 41:20
employing 66:2	enhanced 56:5	event 125:16	excludes 40:8
employment 7:16, 13:11, 13:14, 25:22, 27:7, 27:9, 27:12, 55:5, 56:6, 56:8, 56:18, 57:3, 65:20, 66:7, 71:11, 71:17, 72:9, 86:4, 109:15, 109:17,	enjoy 58:2	every 7:1, 14:15, 33:1, 36:8, 64:20, 65:6, 66:11, 112:21	excluding 22:1
	enough 73:6, 86:4, 87:10, 101:21, 110:16, 114:5, 125:15, 125:22	every 22:22, 24:20, 59:19, 60:7, 72:21, 73:10, 73:15, 73:17, 81:3, 81:11, 88:15	exclusively 62:7, 63:2, 76:15
	ensure 25:12, 46:11		executive 12:21, 15:4,
	enterprises 109:11		
	entire 12:8, 13:2		
	entities 23:9, 23:15, 44:13, 48:20, 97:21		
	entitled 122:17, 122:18		
	entity 10:12, 19:22,		

Transcript of George C. Caruso, CPM, RAM, SHCM, HCCP

Conducted on December 20, 2016

45

Transcript of George C. Caruso, CPM, RAM, SHCM, HCCP

Conducted on December 20, 2016

46

49:4, 52:5, 65:13, 68:18, 70:1, 70:4, 80:1, 92:3, 104:19, 104:20	follows: 6:20 fools 104:12 forbearance 57:18 foregoing 130:4, 130:5 foreign 57:9, 57:17, 58:8, 58:9, 64:16, 67:19, 68:4 forged 37:18, 37:21, 38:2, 68:17, 68:22 forges 37:15, 38:2, 69:16 forgery 69:7, 69:20 form 11:1, 12:17, 13:10, 13:13, 17:15, 21:12, 22:3, 23:19, 24:11, 25:2, 26:8, 26:13, 26:22, 27:19, 28:10, 29:7, 31:2, 31:18, 32:16, 33:22, 36:11, 37:8, 38:8, 40:9, 42:22, 43:19, 44:15, 45:9, 46:3, 46:14, 47:7, 48:8, 50:5, 53:22, 54:10, 55:1, 57:4, 59:3, 60:11, 62:5, 64:4, 65:3, 66:8, 68:5, 69:1, 73:3, 77:8, 77:16, 78:17, 79:6,	79:16, 81:4, 83:15, 83:17, 84:5, 85:1, 86:18, 87:3, 89:19, 92:1, 92:9, 93:10, 97:4, 98:17, 100:4, 101:7, 102:15, 108:21, 109:13, 110:9, 111:16, 112:14, 113:20, 118:19, 122:8, 123:13, 124:2, 124:14, 126:12, 127:8, 128:4, 128:22 forming 33:14 forms 54:19, 54:22, 69:12, 99:14 formulation 129:2, 129:4 fortunate 119:20 forums 84:11 forward 14:6, 22:17, 93:9 found 128:10 foundation 99:1, 117:7, 118:2 four 59:17, 70:9 frame 7:14 franklin 120:14, 120:17 fraudulent 17:7, 62:16 fraudulently 39:1, 39:5 freddie 18:16, 18:17 friends 39:20, 39:22,	40:2, 77:17, 82:15, 120:11, 121:8, 121:15, 123:8 friends' 96:16 front 8:11, 61:8, 76:10, 127:12 full 9:15, 9:17, 10:10 full-time 9:18, 11:16 fully 86:17 fully-documented 39:5 fully-professional 43:11 fundamental 111:14 funding 19:7, 21:5, 23:10, 23:17, 24:10, 26:2, 26:21, 27:16, 28:5, 28:8, 30:20, 47:1, 47:17, 48:18, 48:21 funds 48:16, 71:15, 72:4, 72:18, 99:21 further 79:1, 119:4, 120:22, 121:2 fuzzy 38:9
G			
	gaining 122:2 gallugly 16:14, 123:3 gave 9:18, 37:18,		

Transcript of George C. Caruso, CPM, RAM, SHCM, HCCP

Conducted on December 20, 2016

47

115:6, 125:6	globe	82:4, 82:10, 84:13, 84:14,	46:19, 47:1, 54:2, 58:8,
general	70:12	85:2, 88:2, 89:3, 89:6,	60:8, 85:14, 116:11, 116:15,
52:12, 67:5, 89:4, 119:10, 121:18	go	89:13, 90:21, 91:15, 94:9,	117:2, 117:5, 117:21, 117:22,
generalizations	6:5, 6:14, 8:1, 11:4, 21:11, 21:14, 24:3,	95:8, 102:9, 104:16, 104:17, 104:19, 104:21,	124:5 government's
114:6	24:14, 27:3, 31:13, 32:18,	105:19, 106:10, 108:6, 108:9, 113:4, 113:7,	28:11 government-insured
generalized	33:16, 40:1, 45:11, 47:21,	113:8, 113:11, 114:11, 114:15, 115:12, 119:2,	30:2 government-related
84:12	52:6, 53:2, 60:1, 60:21, 61:14, 61:20,	119:5, 119:13, 124:5, 125:9, 125:18, 127:9,	30:2 grade
generally	63:20, 67:12, 71:3, 75:4, 79:22, 88:21,	129:11 gold	52:5 grandparents
52:17, 74:1, 95:20, 100:14, 113:3, 121:17, 124:11, 124:15	91:12, 94:6, 94:20, 95:2, 97:7, 105:16,	116:15 gone	13:17 grant
generates	105:19, 114:3	127:10 good	99:17 grant-making
46:1	god	127:17 going	107:6 granted
generic	127:17	11:7, 11:14, 63:12, 78:8, 98:12	99:14 granting
55:16	goes	104:10, 115:21, 115:22, 127:2, 129:16	125:10 greater
gentlemen	goes	goofy	105:7, 128:12 green
120:19	11:7, 11:14, 63:12, 78:8, 98:12	70:11 gotta	55:17, 55:18, 56:2, 80:7 ground
george	6:5, 6:6, 11:8, 16:17, 32:8, 33:5, 34:2,	51:20, 59:9, 60:12, 60:16, 61:3, 61:9, 61:16, 62:7, 89:3, 89:5,	42:15, 43:13, 43:21, 65:14, 125:17 grounds
1:15, 2:1, 5:2, 6:17	41:17, 41:18, 42:13, 43:9, 43:10, 47:12, 48:13, 50:12,	90:16, 113:15, 115:18, 118:22, 119:4	10:21 group
gestation	51:13, 52:15, 52:16, 52:17, 53:5, 54:12, 55:16, 56:20,	gotten	44:6 groups
123:6	56:21, 57:2, 58:4, 61:17, 61:20, 63:1, 63:18, 66:3,	93:13, 97:15 government	18:18 guarantee
getting	68:14, 71:6, 74:1, 74:4, 74:10, 74:13, 74:15, 74:16,	26:21, 28:5, 28:8, 29:11, 30:7, 30:8, 30:22, 31:8,	97:18 guess
29:20, 29:21, 70:8, 79:1, 87:3	74:21, 78:4, 78:5, 78:19,	45:14, 46:7,	53:9, 63:19, 70:1, 99:3, 99:4, 116:18 guessing
giron			99:4
1:5			
give			
6:14, 8:10, 8:15, 13:4, 19:5, 36:16, 36:22, 54:6, 63:19, 67:4, 69:20, 70:6, 103:13, 116:4, 119:13, 126:4			
given			
10:7			
given:			
130:6			
gives			
115:17			
giving			
6:7, 8:10, 83:5, 110:7			

Transcript of George C. Caruso, CPM, RAM, SHCM, HCCP

Conducted on December 20, 2016

48

guys 51:5, 71:2	81:13	hill 97:15, 120:7	18:13, 18:20, 19:1, 19:13,
H	17:18, 19:3, 34:2, 68:10, 72:6, 78:4	hire 59:14	23:1, 23:16, 25:2, 26:12,
half 129:6	helped 21:21	hired 60:9	27:16, 28:17, 31:7, 31:11,
hand 52:4, 55:14, 130:14	helpful 36:2	hires 11:9	31:22, 43:10, 45:1, 49:3,
handbook 98:4, 98:5	helping 12:15	hiring 60:13, 60:14, 61:2	55:3, 72:22, 73:5, 96:21,
handle 57:19	helps 116:11	history 74:20, 86:4, 111:19, 112:1	98:5, 98:8, 115:18, 120:1,
handles 80:8	henry 16:12, 97:8	hold 9:3, 23:11, 77:19, 88:10	127:1, 128:8
hands 20:9	here 27:7, 41:11, 49:22, 50:6, 50:17, 55:3, 55:9, 55:16, 55:20, 57:15, 57:17, 59:7, 59:9, 61:20, 61:22, 68:15, 68:17, 72:7, 73:9, 87:12, 90:18, 92:14, 104:14, 104:18, 105:18, 114:12, 116:5, 126:1, 126:21, 126:22, 128:15	holding 20:8, 34:18	however 122:13
hang 120:5, 120:13, 120:19, 120:20	hereby 130:4	holds 99:13	hud 16:1, 18:22, 23:3, 40:17,
happen 58:6, 66:11	hereunto 130:13	home 1:8, 21:7, 21:19, 25:1, 31:21, 42:14, 49:12, 52:11, 88:1, 90:9, 92:6, 98:16, 99:7, 100:3, 125:14, 126:7	48:9, 67:5, 73:7, 98:4, 98:5, 98:9, 99:6, 101:5, 102:13
happened 66:15, 66:22, 82:8	hi 114:20	hook 128:2	hud; 46:2
happens 48:4, 48:6, 66:18	high 67:15, 68:9, 77:19	hottest 123:2	huh 39:14
happy 94:18	high-end 15:9	hours 116:18	hurdles 58:7
harbor 14:9	higher 11:14, 70:13, 70:15, 70:17, 106:1	house 28:15, 41:8	huron 15:15
hard 128:6, 128:7	higher-end 11:19	household 37:17, 81:3, 81:12, 84:21, 88:5, 88:6, 88:15	husband 89:16
head 67:22, 97:7		housing 15:5, 15:21, 16:4, 16:9, 17:14, 18:1, 18:3, 18:4,	hyde 16:12, 16:17, 97:8, 97:11, 97:12, 123:4
header 34:7, 34:8, 34:22			hypothetical 91:12, 92:5, 93:11
hear 80:3			hypothetically 92:10, 92:11
heard 76:19, 126:19, 127:3, 127:5			I
hearing 51:18			i- 54:22
held 2:1, 17:9,			i-9 59:6, 59:7,

Transcript of George C. Caruso, CPM, RAM, SHCM, HCCP

Conducted on December 20, 2016

49

59:13, 59:18, 60:3, 60:22, 61:7, 61:9, 61:16, 62:4, 118:20 id 54:7 ideal 32:15 identification 6:2, 111:15 identify 76:2, 111:11 identifying 113:7 identity 57:10, 58:9, 73:21, 78:10, 112:1, 116:12 illegal 109:7, 116:4 illegally 126:21, 126:22 illegals 127:2 illustration 70:7 imagine 13:5, 58:7 imbue 43:17 immediately 87:2 immigrant 39:5, 66:6, 106:2, 107:20, 112:2 immigrants 16:8, 22:1, 24:8, 36:9, 40:8, 67:20, 68:4, 105:6, 106:3, 108:18, 109:12, 111:6, 124:13 immigration 54:17, 116:10, 117:4, 117:21,	127:11, 127:15 immunity 58:2 impact 18:22 impacts 48:12 implementation 73:6 important 25:5, 25:15, 27:12, 58:21, 75:3, 113:22 impression 68:18 imprimatur 57:21 in-house 10:6 inappropriate 109:5 inaudible) 9:13, 117:13 inbound 100:11 incentive 40:21 incentives 41:1 include 13:18, 13:20, 13:22, 37:21, 41:19 included 21:7, 84:1 including 70:11, 90:8, 99:21, 125:22 income 17:17, 18:5, 18:8, 39:1, 39:6, 67:2, 67:3, 68:12, 73:16, 86:3, 86:11, 87:10, 89:8, 106:8 incomes 56:8	inconsistent 28:16 independence 120:18 independently 119:8 index 80:4, 106:9 indian 98:8 indicated 32:19, 125:6 indicating) 20:7, 52:5, 61:12, 70:9 indication 63:7 indicator 62:22, 80:8 individual 38:15, 41:3, 49:14, 61:6, 62:12, 62:20, 64:1, 64:22, 75:8, 81:12, 84:8, 86:9, 86:10, 89:10, 89:11, 112:13, 113:1, 124:9 individual's 66:7, 91:20, 103:1, 123:1 individuals 63:13, 67:19, 103:21, 109:10 industry 76:5, 95:22, 96:6, 101:19, 119:16, 119:19, 119:21, 120:11, 121:5, 121:7, 128:10 information 25:6, 32:5, 32:14, 33:2, 33:4, 35:12, 35:18, 43:7, 53:8, 73:22,	74:8, 83:11, 93:21, 101:19, 102:8, 112:12, 114:1, 119:13 infrared 70:10 infrastructure 99:21 inherent 18:21 inherently 114:5 initially 93:15 initiate 107:14 input 77:7 inquiries 31:12 inside 20:11, 41:8, 47:11, 47:18, 77:1, 80:5, 80:10, 120:9, 122:12 inspector 67:5 instances 29:15, 54:13, 66:21, 107:7, 113:10 institute 120:3 instruct 32:8, 33:6, 53:5, 94:9, 95:8 instructing 33:9, 35:13, 94:11 instruction 35:8, 35:16, 36:5, 36:7 instructions 95:10 insured 29:17 integrated 80:15
--	---	--	---

Transcript of George C. Caruso, CPM, RAM, SHCM, HCCP

Conducted on December 20, 2016

50

intensively	79:21, 117:10, 122:9, 127:16	july	51:4, 51:11, 51:20, 52:2,
intent	11:12, 16:4, 65:12, 115:12,	jury	52:8, 52:19, 53:15, 53:20,
interchangeably	123:6	justice	54:16, 55:6, 55:17, 55:18,
10:13	it'll	82:11	55:21, 55:22,
interest	118:16	justification	59:5, 59:17, 60:5, 60:9,
18:21, 130:11	item	116:21	60:15, 62:8,
interested	42:16, 42:17, 43:13	justin	66:2, 68:13, 69:13, 70:16,
55:5, 55:15	items	115:8	80:11, 80:13, 81:7, 93:15,
interface	74:4, 74:5	K	97:13, 97:16, 98:15, 99:10,
77:10, 77:11	itin	keep	99:12, 100:7, 100:15, 101:4,
internal	53:15, 53:17, 53:18, 53:20,	kept	101:10, 101:11, 101:15, 101:18,
122:5	54:5, 80:13	key	102:3, 102:4, 102:16, 109:21,
internally	itins	keyboard	111:18, 112:8,
97:11	53:19, 54:22, 55:3, 55:12	51:8	115:19, 116:7,
interrupt	itself	kick	116:17, 116:19, 117:13, 118:3,
8:8, 16:21, 53:1, 61:14	30:22, 36:18, 37:7	kill	118:5, 118:20, 119:6, 119:9,
intervention	J	kind	120:12, 120:16, 125:15, 126:20,
40:20, 41:15	jacket	kinds	126:22, 127:1
intimate	38:2	knowing	127:1
118:4	january	know	knowing
intimately	130:15	12:22, 24:6, 38:22, 96:7,	127:1
117:12	jersey	102:14, 105:5, 106:1, 106:11,	knowledge
introduced	108:15	106:14, 110:5, 110:14, 111:10,	12:22, 24:6, 38:22, 96:7,
16:14, 123:4	job	112:11, 112:20, 119:16, 121:5	102:14, 105:5, 106:1, 106:11,
invent	1:20, 10:2, 52:18, 89:14,	L	106:14, 110:5, 110:14, 111:10,
97:14	90:1, 109:6,	label	112:11, 112:20, 119:16, 121:5
investigation	125:21	35:1	
119:5	jobs		
involve	40:12		
16:8, 48:13	joint		
involved	81:6, 81:7, 81:18, 81:19,		
10:16, 11:10, 11:11, 11:22, 58:8	81:21, 82:2, 84:20, 88:13,		
involvement	89:6		
24:7	joy		
isolate	3:3, 105:2, 116:18		
75:5	judge		
issue	8:11		
11:6, 11:7, 16:8, 22:7, 22:8, 22:19, 25:7, 28:13, 36:18, 38:6,			

Transcript of George C. Caruso, CPM, RAM, SHCM, HCCP

Conducted on December 20, 2016

51

labor	77:1, 103:18,	89:21, 90:6,	84:16, 90:8,
60:14	109:22, 115:13,	90:21, 91:17,	97:22, 103:1,
lack	116:20, 124:8,	91:19, 91:22,	115:3, 118:9,
106:8, 106:9	128:11	92:3, 92:8,	118:15, 123:1,
lag	late	92:13, 92:14,	123:21, 128:2,
8:3	16:12, 22:12	92:15, 92:21,	128:6, 128:15,
laid	later	93:2, 93:6,	128:19, 128:20
67:11	21:3	96:13, 111:14,	legality
lake	law	121:11, 121:16,	25:17
14:11, 15:13	7:16, 65:15,	121:18, 122:3,	legally
landlord	66:1, 125:15	125:17, 126:2	25:21, 27:17,
26:11, 26:19,	laws	lease :	28:1, 28:7,
26:20, 27:15,	25:15, 54:18,	31:1	50:4, 50:7,
28:3, 29:3,	59:5, 119:1	leased	50:17, 55:3,
29:4, 29:5,	lawyer	57:16	55:7, 55:9,
29:12, 30:13,	81:6	leaseholder	55:10, 55:20,
30:15, 42:2,	lawyer's	50:3, 88:3	59:8, 59:9,
62:20, 63:4,	95:9	leases	62:1, 63:8,
110:8, 116:11	lawyers	42:11, 58:19,	63:15, 64:1,
landlord's	32:21, 108:3	81:5, 81:18,	68:15, 72:16,
30:10, 31:1,	lay	81:21, 82:3,	84:8, 87:13,
31:16	91:13	82:18, 83:1,	90:18, 92:14,
landlord-tenant	lays	83:3, 83:9,	104:14, 104:19,
58:5, 125:15	50:18	84:21, 85:6,	105:18, 116:5,
landlord;	leads	88:13, 103:11	122:17, 124:21,
43:18	104:5	leasing	125:8, 126:1,
landlords	leaping	27:7, 78:6,	129:10
26:5, 39:9,	108:22	129:8	legislation
41:12, 81:22	learn	least	17:5, 22:5,
language	108:17	99:4, 109:17,	22:10, 22:16,
73:6	lease	109:19, 109:20,	25:11, 26:4,
large	13:19, 13:21,	113:5, 122:7,	96:21, 98:13
14:10, 56:14,	29:2, 29:4,	125:13	legislative
110:22	29:13, 30:11,	leave	120:7, 123:3
largely	31:5, 39:6,	110:7	legitimate
33:15	42:16, 43:1,	leaving	68:19, 71:11,
larger	43:3, 43:13,	13:5, 110:17	109:15, 109:17
115:10	43:21, 58:21,	leesburg	less
largest	71:12, 71:16,	3:12	36:21, 37:1,
14:14, 15:12,	72:13, 72:16,	left	47:5
15:14	72:19, 72:21,	28:8, 28:11	let's
last	78:11, 81:7,	legal	20:3, 22:15,
7:6, 7:10,	81:13, 83:7,	3:11, 26:6,	37:5, 41:20,
7:11, 11:17,	84:2, 85:19,	38:6, 50:5,	58:14, 85:10,
37:9, 56:20,	85:22, 86:12,	58:20, 61:4,	85:16, 85:19,
61:2, 66:22,	87:17, 88:3,	62:13, 62:21,	87:15, 87:21,
67:22, 74:11,	88:4, 88:17,	64:13, 65:19,	105:16, 106:16
74:13, 74:19,	89:5, 89:12,	72:2, 72:8,	level

11:15, 17:17,

Transcript of George C. Caruso, CPM, RAM, SHCM, HCCP

Conducted on December 20, 2016

52

106:21, 117:12 liberal 102:6 license 70:3 licenses 70:4 licensing 103:9 lied 66:13 lies 68:8 life 60:6 lift 40:17 likelihood 126:1 likely 103:20, 106:12, 108:9, 108:19, 109:11, 110:6, 111:6 limited 1:8, 31:3, 54:15 line 104:15 lisa 1:22, 2:19, 130:3 list 24:17, 50:10, 50:12, 50:14, 50:15, 51:3 listed 90:9, 92:7 listen 51:13 lists 19:9, 23:14 literally 20:4, 31:12, 73:7, 73:14, 80:2, 85:5 litigation 49:21	little 8:3, 17:18, 27:6, 38:9, 70:11, 77:5, 104:3, 112:6, 122:10 live 104:10, 124:6 living 42:8, 71:19, 88:1, 109:5 llc 100:8 llp 2:3, 3:4, 4:4 loan 29:19, 29:20, 30:6, 30:7 lobbied 16:16 lobby 124:5 lobbying 15:7, 15:17, 16:7, 17:21, 18:6 local 29:2, 100:11, 114:5 locality 75:12, 112:16 located 34:10 location 125:13 locations 14:17 logistical 58:7 logistics 10:20 long 20:5, 20:7, 20:10, 97:14, 107:12, 116:1, 125:19 longer 11:21, 71:22,	79:20 look 9:4, 29:21, 31:9, 31:12, 34:21, 47:11, 49:5, 54:12, 63:20, 74:13, 74:15, 78:15, 79:1, 84:14, 87:9, 97:9, 100:2, 100:9, 100:10, 100:14, 106:5, 114:3, 116:5 looked 11:7, 61:2, 65:6, 68:18, 77:2, 79:21, 86:15, 86:21 looking 24:17, 24:18, 41:10, 57:1, 57:5, 69:13, 74:6, 75:5, 99:22, 108:3, 111:12 looks 70:3 lookup 78:8 lose 125:19 lot 14:3, 38:18, 40:2, 41:6, 41:7, 43:2, 58:3, 59:17, 65:11, 65:13, 70:3, 70:12, 86:15, 101:14, 109:16, 109:21, 113:10, 120:5, 120:10, 125:20, 126:7 lots 43:2, 54:14, 124:4 loud 51:16	louisiana 14:20 low 18:7, 68:9, 68:12, 110:20 low-income 31:22 lower 106:2 lowest 70:18 lunch 82:15, 106:19, 122:19, 123:8, 126:16 lunches 101:21 luxuries 15:9
M			
ma 'am 7:3 mac 18:17 made 93:14, 116:3, 116:4 maintain 23:7, 44:18, 44:20 maintaining 47:15 major 11:8, 13:22, 14:6, 73:5, 76:1, 106:5 majority 87:18, 104:9 make 29:18, 35:7, 51:16, 51:20, 52:13, 61:9, 67:17, 69:19, 81:9, 87:12, 88:12, 89:5, 90:5, 94:15, 96:22, 102:7,			

Transcript of George C. Caruso, CPM, RAM, SHCM, HCCP

Conducted on December 20, 2016

53

107:12, 110:2, 114:6, 115:22, 119:8, 125:20 makes 60:6, 109:4, 126:14 making 39:3, 42:19, 51:8, 55:6 male 85:19, 90:7, 91:18 manage 9:11, 11:18, 13:16, 21:22, 23:3, 40:18 managed 14:2, 14:10, 15:3, 15:9, 15:12, 15:14, 19:6, 21:7, 48:19 management 9:20, 9:22, 10:7, 10:11, 10:14, 11:16, 11:20, 12:11, 12:12, 12:20, 12:21, 14:9, 14:10, 15:5, 15:21, 23:6, 28:15, 28:16, 40:17, 41:6, 41:13, 44:6, 57:7, 82:1, 82:9, 82:17, 83:13, 96:14, 102:20, 120:2, 123:10 management's 120:4 manager 13:15, 45:6, 69:2, 80:1 managers 101:2, 101:3, 101:4, 101:10, 101:13, 101:15,	101:16, 101:20, 102:2, 127:22 managing 9:6, 22:18, 40:18, 48:1 mandated 60:5 manner 43:12, 65:9 manual 62:8, 85:6, 98:10, 98:11, 101:5 manuals 12:9, 99:6, 102:13 many 7:4, 7:7, 14:1, 36:14, 41:5, 54:13, 66:15, 66:21, 67:18, 74:22 marked 6:1, 8:19, 34:19 market 32:2 maryland 40:4, 82:7, 108:12, 108:14 match 78:22 material 102:11 materially 67:2, 67:15 materials 33:13, 125:6 matter 67:21, 112:22, 116:13 matters 102:1, 120:8 maybe 9:3 mclean 1:16, 2:6, 4:7 mean 11:15, 16:21,	42:12, 52:10, 54:16, 55:7, 61:13, 70:12, 73:5, 76:6, 80:8, 110:21, 119:3, 119:18 meaning 41:22, 45:5, 60:3, 67:3, 69:12, 90:18, 106:14, 109:5, 110:17, 123:20 means 23:4, 25:20, 28:14, 45:8, 50:4, 52:17, 58:12, 61:19, 61:21, 88:7, 90:2, 93:2, 93:5, 119:4 meant 51:17, 51:22 measure 116:20 median 18:5 medium-sized 115:9 meet 49:7, 49:11, 89:22, 90:2, 90:10, 93:3, 93:7 meeting 67:11 meetings 10:5, 101:21 meets 89:16, 91:18 member 82:20 members 85:7 memphis 15:2 mention 57:15 mentioned 40:7, 40:11,	45:4, 58:19, 64:6, 68:15, 78:9, 96:20, 116:19 mentioning 38:16 merchant 14:21 met 29:19, 90:7 methodology 73:11 microphone 51:7 mid 15:11, 123:4 mid-career 15:4 mid-city 9:19, 10:1, 10:10, 10:15, 12:16, 12:19, 13:8, 36:9, 38:14, 44:5, 44:14, 45:5, 45:20, 47:6, 55:12, 56:1, 57:9, 63:4, 75:19, 76:12, 84:20, 85:21, 88:14, 90:6, 91:21, 93:9, 93:12, 107:21, 111:4 middle 22:11, 110:18 might 8:3, 13:5, 33:16, 74:6, 108:6, 109:8, 109:16, 116:17, 125:13 mighty 69:15 military 64:9, 64:10, 64:17, 64:21 million 128:13
--	--	---	--

Transcript of George C. Caruso, CPM, RAM, SHCM, HCCP

Conducted on December 20, 2016

54

mind 76:22, 87:11, 104:20, 104:21	58:22, 63:5, 71:13, 72:11, 72:14, 84:4, 85:12, 85:15, 85:18, 91:10, 102:21	mortgage 20:22, 41:19, 41:20, 41:22, 42:4, 42:5, 42:7	must 27:16, 49:11, 88:15
mine 70:5	85:18, 91:10, 102:21	mortgaged 42:18	mute 51:12
minimum 99:12	mobile 1:8, 14:18, 21:7, 21:19, 25:1, 31:21, 42:14, 49:11, 52:11, 98:16, 99:7, 100:3, 125:14, 126:6	mortgages 18:14, 29:17	myself 13:14
minute 6:6, 8:9, 87:2	moment 23:9, 65:10	mortgagor 42:6	N
minutes 94:19, 124:17	monetary 41:16	most 8:16, 12:3, 14:22, 21:16, 24:16, 28:18, 28:20, 29:19, 37:5, 54:11, 67:7, 68:13, 69:10, 74:2, 74:11, 78:18, 81:5, 97:16, 100:19, 106:21, 108:6, 111:1, 113:8, 113:9, 116:13, 119:22, 120:13, 120:20, 121:15, 125:10, 127:12	nail 27:5
mis 88:18	monthly 45:14	motivation 46:11	name 12:12, 34:3, 75:4, 76:19
misallocation 48:10, 48:16	months 123:5, 128:11	move 51:13, 58:18	names 74:16
mischarac 96:9	more 14:16, 15:2, 17:18, 19:18, 29:2, 47:10, 55:5, 66:17, 69:12, 69:19, 76:11, 85:3, 86:15, 86:21, 103:7, 103:19, 104:5, 106:8, 106:12, 108:19, 109:4, 109:11, 110:6, 111:6, 111:11, 112:7, 115:16, 116:3, 116:22, 120:6, 120:10, 121:17	moved 14:12, 14:17, 22:12, 69:12	naming 82:10
mischaracterize 17:3, 44:9, 80:21, 81:15, 89:1, 90:12, 98:2, 105:9, 112:4, 112:6, 121:13, 124:3, 125:2	moving 60:6, 109:7	narrow 41:17, 42:13, 94:1	
mischaracterizing 90:16	much 11:5, 15:10, 18:13, 49:17, 80:6, 108:13, 110:22, 112:7, 120:6	national 15:5, 15:21	
misrepresent 66:6, 69:14	mugshots 113:11	nationals 57:17, 58:10, 64:17, 67:20, 68:4	
misstate 96:5	multifamily 9:11	nature 19:19, 43:12, 101:9	
misstated 67:9	multiple 7:9, 75:3	naval 64:10	
misstatement 67:16		near 70:19	
misstatements 68:2		necessarily 17:4, 43:13, 72:3, 90:1	
misstating 67:2, 68:12		necessary 25:8, 47:14, 81:2, 108:7, 113:18	
mitchell 14:18		need 6:9, 8:21, 9:4, 11:13, 23:6, 41:17, 41:18, 61:6, 71:4, 71:10, 74:21, 78:4, 84:13,	
mixed 28:14, 28:18, 115:14			
mm-hmm 44:7, 45:7, 45:22, 47:3, 48:3, 56:4,			

Transcript of George C. Caruso, CPM, RAM, SHCM, HCCP

Conducted on December 20, 2016

55

85:2, 99:10, 99:12, 100:8, 111:18, 115:22 needs 11:7 neighborhood 107:5 neither 130:10 never 43:2, 82:16, 82:17, 82:18, 104:13 new 93:7, 108:14 next 93:2 nexus 70:8 nice 127:17 nicely 112:5 night 110:19 nobody 22:9, 29:5, 86:17 non-assisted 19:13, 23:8, 85:10, 86:8, 87:7, 87:8, 87:15, 91:17, 115:1, 115:7, 124:19 non-funded 48:22 non-hud 115:1, 115:7, 124:19 none 8:17, 106:20 nonrenewal 93:8 nope 93:20 normal 95:21	normally 71:5 northern 39:9, 40:4, 82:2 northwest 3:5 notarial 130:14 notary 2:21, 130:20, 130:22 note 129:14 notes 51:20, 99:13 nothing 6:19 notice 2:19, 110:7 number 14:4, 15:16, 36:16, 36:22, 40:2, 50:22, 54:7, 58:1, 61:7, 61:12, 61:18, 62:3, 62:13, 62:19, 63:6, 63:14, 64:3, 65:1, 73:20, 75:7, 76:21, 77:6, 77:12, 78:1, 78:6, 78:13, 79:4, 79:7, 79:14, 80:13, 98:11, 99:19, 100:6, 104:12, 109:20, 110:20, 112:21, 113:4, 113:18, 115:8, 122:6, 130:22 numbers 62:16, 75:2, 97:16, 113:6	obtain 65:20, 118:10, 118:17 obtained 83:12 obtains 117:4 obviously 38:17, 40:12 occasional 106:19 occasionally 10:13, 36:17, 69:15, 108:4, 122:8, 123:12, 123:17 occupancy 98:4 occupies 20:6 odom 3:3, 5:3 of: 2:2 offender 74:21, 75:8, 112:13, 113:1, 113:13 offense 38:10, 38:11, 68:13 offer 126:3 offered 91:9 offering 27:13, 94:16 office 76:8, 76:10, 102:9 officer 12:22, 130:3 officers 64:10 offices 2:2 officially 10:3	okay 6:13, 7:15, 9:2, 28:3, 30:6, 41:10, 48:15, 52:7, 76:8, 78:9, 85:10, 86:7, 87:8, 88:9, 91:7, 92:10, 92:20, 94:20, 95:19, 103:17, 114:2 old 14:9, 59:18 once 14:7, 66:18, 113:21 one 2:4, 4:5, 7:13, 8:5, 9:18, 11:7, 11:9, 11:13, 12:19, 15:11, 16:5, 22:19, 23:6, 23:17, 28:18, 31:3, 33:16, 37:16, 38:6, 38:9, 38:17, 41:1, 41:9, 44:4, 47:10, 47:17, 48:4, 48:11, 48:17, 48:18, 48:20, 51:12, 52:3, 54:6, 55:14, 58:1, 58:13, 60:2, 61:16, 70:7, 70:17, 73:22, 75:17, 76:16, 77:2, 78:7, 79:18, 79:19, 80:18, 83:1, 83:3, 84:21, 86:9, 86:10, 87:10, 88:16, 89:10, 89:11, 91:4, 100:6, 103:13, 103:18, 104:15, 104:19,
		O	oath 6:15

Transcript of George C. Caruso, CPM, RAM, SHCM, HCCP

Conducted on December 20, 2016

56

105:5, 109:1, 109:6, 110:10, 111:9, 115:9, 121:8, 121:10, 121:14, 122:16, 123:2, 127:5 one's 50:12 one-size-fits-all 100:17 ones 55:4, 70:15 oneself 58:3 online 113:11 only 8:5, 12:19, 21:8, 30:15, 32:20, 34:1, 35:4, 36:16, 36:17, 50:16, 56:20, 62:6, 78:7, 88:16, 89:18, 89:21, 90:9, 91:19, 109:1, 109:6 open 10:21 openly 119:11 operate 19:1, 19:14, 19:15, 23:2, 40:5, 43:11, 44:17, 44:18, 100:21, 115:20 operated 10:8, 14:19, 21:19, 47:19 operates 42:21 operating 33:17, 45:18, 112:17 operation 10:14, 10:15, 10:18, 13:22,	19:19, 45:15, 46:1 operational 10:5, 14:7, 30:3 operations 10:6, 10:17, 11:6, 19:12, 20:21 operators 50:1 opine 32:3 opinion 26:18, 27:11, 27:14, 30:18, 30:20, 34:4, 44:13, 77:14, 80:18, 81:9, 83:6, 93:22, 97:20, 103:19, 109:10, 110:10, 110:13, 111:22, 115:5, 120:8 opinions 26:1, 27:18, 32:5, 33:14, 33:15, 43:8, 91:9, 94:16, 95:16, 119:15, 121:4 opportunity 97:2, 128:8 opposed 19:13, 68:3, 71:16, 106:3 opposing 119:19 oral 50:16 order 25:6, 27:14, 27:21, 46:5, 49:12, 52:15, 59:8, 61:7, 61:9 organization 15:22, 16:19, 16:22	organized 102:4 originally 92:3 other 8:2, 27:6, 31:6, 31:7, 33:1, 35:9, 35:17, 36:6, 38:15, 40:4, 41:4, 41:7, 44:18, 47:11, 48:12, 50:5, 57:18, 58:3, 58:13, 60:2, 63:12, 64:18, 70:11, 70:12, 73:11, 74:8, 80:3, 87:3, 90:2, 90:17, 96:13, 98:3, 98:22, 101:8, 102:1, 106:9, 107:7, 108:9, 109:1, 109:22, 110:11, 111:9, 113:4, 113:5, 113:7, 114:1, 123:9, 127:6 others 10:9 otherwise 23:2, 106:22, 109:15, 109:17, 130:12 ourselves 128:11 out 9:1, 11:15, 17:18, 28:8, 50:18, 58:5, 59:6, 61:7, 67:12, 68:10, 68:19, 70:2, 71:6, 72:6, 78:4, 78:8, 91:13, 100:8, 105:19, 107:12,	113:16, 122:14 outcome 130:12 outset 52:1 outside 38:6, 64:20, 94:10, 102:11, 107:21, 111:4 outsource 56:14 over 8:1, 8:2, 14:2, 15:8, 17:10, 21:7, 21:22, 34:11, 50:2, 57:16, 66:21, 81:12, 83:8, 85:7, 87:18, 88:10, 96:8, 96:17, 97:13, 97:14, 101:9, 106:19, 107:10, 117:18, 119:22, 124:4, 127:18 overseeing 12:14 owing 110:18 own 9:20, 9:21, 10:19, 13:16, 33:13, 39:13, 39:15, 79:7, 83:7, 96:7, 102:19, 119:17, 120:9 owned 10:12, 15:3 owner 107:15 owner's 10:4 owners 17:6, 17:9, 24:18, 50:1, 75:18, 102:5, 107:11, 125:21
---	---	--	---

Transcript of George C. Caruso, CPM, RAM, SHCM, HCCP

Conducted on December 20, 2016

57

ownership 10:15, 47:12, 106:5	78:10, 78:21, 101:1, 106:4, 107:6, 111:1, 111:14, 115:3, 116:2, 119:18, 125:7	pattern 49:5	71:16, 126:6, 127:12
P		pay 56:17, 56:20, 72:4, 72:18, 81:13, 106:13, 116:19, 125:9, 126:2	permit 65:21, 118:11
package 43:12, 52:22, 56:7, 116:2		permits 11:13, 11:14, 57:13	
page 5:2, 5:11, 34:22, 85:5, 109:1, 111:13, 118:8		person 53:20, 54:9, 62:18, 72:16, 75:5, 75:6, 89:12, 89:14, 108:20, 117:4, 118:15, 119:13	
pages 35:1		person's 72:2, 72:8	
pages: 1:21		personal 24:5, 83:7, 96:7, 97:1, 102:19	
paid 29:20, 52:15, 52:16, 58:4, 89:6, 129:9, 129:11		perspective 18:2	
pair 86:7		petitions 107:10	
paper 59:18, 70:6, 70:20		phone 71:5, 80:4	
parent 10:12, 85:20, 87:16		phonetic) 65:10, 100:6	
parents 13:17		phrased 45:6	
park 1:8, 25:2, 31:21, 49:12, 52:11, 98:16, 99:7, 100:3		pick 78:20	
parks 21:20, 125:15		picked 38:10	
parse 85:2, 105:17		picks 77:3	
part 9:22, 24:16, 26:1, 30:20, 45:15, 46:10, 51:20, 55:13, 56:2, 71:11, 72:10, 74:18,		picture 30:7, 70:5	
		piece 25:5, 70:6, 74:19, 78:7	
		pieces 27:11, 30:18, 73:22, 74:8, 114:1	
		pih 98:6, 98:10	
		pike 3:12	

Transcript of George C. Caruso, CPM, RAM, SHCM, HCCP

Conducted on December 20, 2016

58

place	91:3, 91:5, 102:6	128:11	88:4, 88:6, 90:17, 92:6, 124:21
policy	12:8, 15:7, 15:17, 16:7, 17:22, 18:6, 22:1, 22:19, 23:17, 24:8, 25:7, 40:7, 40:21, 47:16, 49:15, 49:20, 50:9, 50:18, 52:9, 65:9, 87:12, 92:7, 92:11, 92:13, 92:22, 93:1, 102:14, 102:22, 116:9, 124:12, 124:20, 126:9, 128:12	positions 14:7, 74:17, 119:21	presented 17:6
places	128:6, 128:7	positive 74:5, 74:7	presents 56:2
plaintiffs	40:5, 98:3, 106:6, 128:9	positives 74:22, 113:14	president 12:22, 14:8, 120:1, 127:14
plaintiffs:	1:6, 6:21, 121:2	possesses 62:19	pretty 15:10, 65:22, 111:2
plan	3:2	possession 125:18	prey 108:9, 109:4
planet	49:13, 50:19, 50:20, 122:15, 127:2	possible 39:4, 96:12	price 82:17
plans	70:18	post 39:17, 107:17	pricing 121:16
play	11:10, 90:19, 122:5, 122:22, 126:18	potential 72:12	primary 13:10, 13:13
pleadings	22:6	potentially 93:6, 102:10	principal 97:8
please	125:8	practice 49:5, 95:21, 96:7, 115:2	principally 14:19, 18:3
plowed	71:3, 96:5	practices 95:22	printed 70:20
plus	65:14	prd 39:21	prior 7:13, 12:4, 79:5
point	14:20, 113:10	precise 36:16, 36:22	prison 109:18
police	9:14, 12:13, 13:11, 14:5, 15:11, 15:13, 46:4, 53:19, 76:15, 97:15, 120:22, 127:18	precisely 26:14, 32:1, 43:1, 80:11	private 42:5, 60:8, 60:9
policies	106:6, 108:1	precision 38:1	privilege 94:12, 95:8
	12:2, 12:6, 12:7, 12:10, 12:11, 12:15, 13:1, 23:6, 23:22, 46:11, 48:21, 49:14,	prefer 76:2	privileged 33:3, 35:12, 35:17, 95:18
		premise 87:14	probably 7:21, 34:10, 37:1, 49:17, 53:18, 70:14, 86:2, 87:9, 89:20, 100:5, 120:16, 123:4
		prerequisite 123:22	problem 36:3
		prerequisites 122:2	
		presence 28:6	
		present 22:18, 23:12, 27:17, 47:17, 72:16, 84:8,	

Transcript of George C. Caruso, CPM, RAM, SHCM, HCCP

Conducted on December 20, 2016

59

problems 115:18	22:19, 24:7, 36:10, 38:18,	proverbial 128:5	47:22, 49:22, 53:4, 53:7,
procedure 112:18	39:17, 40:6, 48:2, 76:3,	provide 50:9, 50:11, 51:1, 56:15	53:13, 53:14, 60:20, 62:18,
procedures 67:4, 107:14	85:13, 98:22, 101:15, 104:16,	provided 33:2, 37:14, 122:16	72:13, 77:5, 77:6, 78:9,
process 36:18, 37:9, 56:3, 57:11, 60:22, 63:10, 67:9, 67:11, 68:16, 73:15, 73:17, 110:16, 114:5, 115:3	104:18, 105:20, 107:5, 107:11, 110:1, 124:1	provisions 59:5, 81:20	85:2, 86:7, 87:14, 94:8,
processes 11:11, 69:11, 69:19	properties' 12:1, 122:22	prwora 97:6, 98:15	94:10, 95:3, 95:6, 99:11,
processing 55:8	properties; 9:6	public 2:21, 98:5, 98:8, 130:20	103:18, 117:17, 124:18, 126:19
produced 33:20	property 10:7, 15:15, 22:22, 23:14,	pull 75:7, 75:9, 107:22, 108:1,	questions 94:2, 95:20, 114:11, 114:15,
producing 17:10	24:17, 24:20, 28:19, 38:5, 38:7, 38:12,	108:2, 112:12, 112:18, 112:22	114:16, 114:21, 114:22, 120:22,
product 75:18	41:13, 42:8, 48:5, 48:6,	pulled 11:13	121:1
program 77:1, 77:7	82:1, 83:13, 91:13, 91:17, 96:14, 99:17, 99:18, 101:1,	pulls 11:14	quick 58:14, 71:4, 87:9, 94:21
programs 68:11, 77:10	101:6, 101:20, 102:14, 107:10, 107:14, 108:8, 110:7, 122:3,	purpose 95:13	quickly 14:6
projects 11:19	124:12, 127:22, 128:18	purse 70:2	quinn 3:4
promptly 122:16	proposals 65:12	pursuant 2:19	quite 62:17
proof 57:10, 58:9, 115:2	proposing 18:22	put 34:4, 57:1, 93:9, 111:5, 119:2, 122:14	quote 65:18
proper 29:12, 111:15	proposition 52:12	<hr/> Q <hr/>	
properly 111:11	proprietary 79:10, 122:11	qualify 27:21	raid 68:16, 69:4, 110:2
properties 9:21, 12:16, 13:3, 13:4, 13:19, 13:21, 14:11, 15:1, 15:10, 19:6, 21:6, 21:8, 21:21, 22:17,	26:19, 29:13, 49:11, 50:9, 50:21, 56:1, 73:21, 76:14, 84:3, 111:12, 124:21	quality 30:10, 77:15, 77:20	raids 38:17, 107:17
	prove 62:13	question 7:5, 8:6, 22:15, 26:10, 27:4, 28:3, 32:7, 33:4, 35:20, 41:18, 44:11, 46:17,	raise 52:4, 87:4

Transcript of George C. Caruso, CPM, RAM, SHCM, HCCP

Conducted on December 20, 2016

60

rates	46:22, 48:7, 85:14, 97:21	reference	20:11, 20:13, 21:1, 21:4, 97:21, 124:6
rather	received	referral	regulator
103:9	19:7, 23:10, 25:2, 42:4	67:6, 67:17	84:15
ratio	receives	referrals	regulators
23:8, 23:11	26:12, 46:18, 48:17, 48:20	67:8, 67:18	84:17
reach	receiving	referring	regulatory
70:2	26:21, 28:4, 45:20, 86:11	97:1, 107:18	11:12, 12:11, 40:20, 41:15, 43:18, 46:2, 46:5, 47:5
reacting	recent	refinancing	relate
37:10	37:5, 69:11, 70:14, 78:18, 92:7, 123:7	107:3	18:7, 107:19
read	recently	refinancings	related
80:4, 93:19	109:18, 119:22	107:3	17:22, 22:10, 34:1, 55:20, 57:14, 102:22, 130:10
readable	recently-retired	regarding	relates
70:10	77:18	20:19, 43:16, 105:15, 108:13, 117:15, 123:16	22:5, 98:10, 122:22
reading	recognizing	regional	relation
98:18, 130:9	109:21	76:2	96:6, 115:20
real	recommend	register	released
15:22, 16:6, 113:14, 120:3	44:19	54:6	109:18
really	reconciliation	registration	relevant
30:17, 32:3, 58:12, 75:2, 111:7, 113:16	97:2	130:22	43:8, 43:14, 48:5, 48:21, 70:7, 72:3, 72:9, 93:22
realpage	record	registries	relied
76:15, 76:16, 76:20, 79:20	6:5, 34:18, 35:7, 35:15, 36:4, 58:16, 71:7, 94:20, 94:22, 114:17, 129:17, 130:6	74:21	95:15
realty	recorder	registry	rely
14:9	20:8, 98:7	75:8, 112:13, 113:1	33:12, 119:12
reason	records	regret	relying
8:15, 9:5, 9:14, 14:5, 91:19, 93:8, 97:10, 100:16	108:2, 108:3, 108:4, 113:3, 113:16, 113:19	8:20	53:6
reasonable	red	regs	remember
52:14, 52:16, 115:2, 124:20, 125:5	80:7	63:17, 93:16	7:8, 15:16, 34:8, 38:1, 38:11, 65:11, 67:22, 77:9, 82:8, 98:6, 124:7
reasons	reduced	regular	remind
23:1, 52:9, 109:16, 115:8	130:8	57:16, 107:2, 120:5	87:6
recall	reed	regularity	remote
37:9, 38:9, 38:16, 63:22, 65:4, 116:17, 124:22	2:3, 4:4, 32:12, 32:17, 32:19	66:18	8:2
receive	refer	regulate	
23:16, 24:9, 32:4, 38:14,	8:21, 10:13	99:7, 102:13	
		regulated	
		101:11	
		regulates	
		98:16	
		regulations	
		19:18, 20:6,	

Transcript of George C. Caruso, CPM, RAM, SHCM, HCCP

Conducted on December 20, 2016

61

remotely 6:11	reporting 19:18, 106:5	researched 106:22	responsibility 8:13, 12:14,
removing 36:19, 37:15, 37:17	representative 7:18, 10:4, 16:12, 16:13, 16:17, 97:12	reserved 71:15, 72:4	97:2
render 33:16	representatives 123:3	reside 64:14, 92:14	responsible 13:1, 17:9, 81:13, 88:7, 88:17, 88:19
renewal 93:3	republic 130:1	residence 36:19, 50:6, 55:7	rest 61:18, 62:22, 63:11
renewed 93:6	request 33:1	residences 74:15, 74:17, 78:3, 78:19, 79:5	restate 27:4, 35:22, 118:1
rent 13:19, 13:21, 38:20, 52:14, 52:16, 58:6, 88:8, 106:13, 125:10, 125:12, 129:9, 129:11	requested 20:18, 43:15, 105:14, 117:14, 123:15	residences; 78:16	restrictions 43:3
rental 15:12, 21:16, 42:8, 71:16, 72:5, 72:18	requested; 130:9	residency 17:1, 17:8, 25:13, 26:5	restrictive 28:20, 100:20, 115:16
rephrase 26:17, 117:3	require 76:20, 77:11, 97:21, 115:2	resident 31:13, 50:5, 89:10, 89:18, 89:21, 90:9, 92:8	resumé 8:18
replace 11:18	required 49:7, 51:1, 59:19, 60:2, 67:17, 73:20, 77:7, 79:14,	residential 9:6, 13:18, 13:21, 14:1, 15:12, 19:12, 21:15, 21:16, 39:8, 39:19, 41:12, 46:12, 57:7, 82:1, 83:12, 123:9, 128:18	retail 21:19
report 5:12, 8:19, 8:22, 27:13, 33:14, 34:6, 34:20, 43:8, 58:20, 65:18, 78:21, 83:6, 84:13, 95:4, 95:13, 95:16, 95:17, 108:16, 111:13, 118:8, 119:16, 121:5	requirement 16:15, 50:2, 98:3, 98:5, 98:11, 118:21, 128:18	residents 38:19, 55:4, 115:21	retired 7:19, 9:14, 11:16, 11:17, 16:13, 120:6
reported 1:22	requirements 17:1, 17:8, 24:19, 46:13, 49:10, 67:14, 89:17, 89:22, 90:3, 90:7, 90:10, 99:16	resort 56:20	retirement 12:5, 12:13, 13:12
reporter 2:21, 6:6, 6:14, 8:5, 20:18, 43:15, 105:14, 117:14, 123:15	requires 50:9, 84:2, 124:20	respect 103:22	reveal 78:1, 79:5
reporter-notary 130:1	requiring 92:22, 128:18	respectfully 104:3	revealed 36:18, 37:6, 37:13
	research 14:3, 19:9, 99:2	respond 107:9, 107:16	review 33:20, 35:10, 67:13
		response 45:3, 80:22, 124:17	reviewed 107:6
		responsibilities 10:1, 12:18	reviewed; 35:5
			reviewer 12:3, 12:6
			reviews 11:10
			reyes 1:5
			rifling 80:3

Transcript of George C. Caruso, CPM, RAM, SHCM, HCCP

Conducted on December 20, 2016

62

right 6:4, 7:1, 7:10, 7:13, 7:20, 8:18, 9:7, 9:10, 26:17, 27:20, 30:9, 31:17, 34:14, 34:16, 35:3, 35:5, 41:11, 41:20, 42:3, 42:7, 43:18, 52:8, 58:14, 71:6, 75:6, 78:12, 78:16, 81:10, 81:17, 96:8, 104:11, 114:7, 120:21, 125:21, 126:5, 128:15, 129:12 rights 88:11 righty 7:17 rigor 106:21 rise 106:20 risk 29:4, 43:18, 46:2, 47:5, 72:12, 86:5, 103:20, 105:7 road 7:22 rock 128:5, 128:6 rogues 104:12 rosy 1:5 roughly 18:4, 19:5, 128:13 roundabout 29:20 ruined 82:13 rule 93:13, 95:18	rulemaking 18:21 rules 7:22, 18:21, 19:17, 31:11, 40:13, 40:19, 43:10, 45:2, 47:18, 49:8, 67:4, 85:5, 99:20, 100:20, 108:13 run 28:12, 28:18, 62:16, 72:20, 76:21, 77:7, 77:20, 79:14, 80:14, 103:8 running 16:5, 28:13, 28:15, 80:16 résumé 119:19, 119:20	25:14, 26:20, 30:12, 36:15, 41:15, 44:4, 44:14, 44:21, 48:19, 49:1, 49:6, 49:8, 61:1, 65:8, 69:9, 69:22, 72:21, 72:22, 73:11, 73:15, 75:4, 84:10, 86:1, 86:7, 86:12, 86:14, 87:14, 90:10, 91:1, 93:17, 96:15, 97:1, 97:19, 98:21, 103:11, 110:15, 113:2, 122:4 S s 15:11, 22:11, 22:12, 22:16, 65:13, 123:4 sabbatical 15:4 safe 116:1 safety 103:20, 105:7 said 16:22, 17:22, 20:12, 23:9, 24:15, 26:3, 34:8, 47:13, 47:20, 47:21, 50:14, 52:19, 71:1, 78:14, 90:15, 96:16, 100:19, 101:12, 109:14, 112:5, 115:13, 121:4, 130:6 same 10:12, 19:14,	scientifically 68:6 se 17:8 seal 130:14 season 127:10 second 26:1, 27:14, 47:20, 51:5, 103:13 section 20:5, 117:18 sector 19:2 secure 69:12, 116:22 security 37:22, 50:22, 61:7, 61:12, 61:18, 62:3, 62:13, 62:16, 62:19, 63:6, 63:14, 64:3, 64:22, 70:10, 70:13, 70:15, 70:17, 70:18, 70:19, 70:21, 73:20, 75:2, 75:7, 76:20, 77:6, 77:12, 78:1, 78:5, 78:13, 79:4, 79:14, 112:21, 113:18 see 34:11, 34:12, 34:16, 36:6, 36:17, 54:18, 55:15, 55:17, 55:20, 57:2, 64:16, 69:10, 70:13, 70:16, 79:1, 79:12, 80:6, 80:10, 84:18, 100:10, 107:14, 109:8, 106:21
---	---	--	---

Transcript of George C. Caruso, CPM, RAM, SHCM, HCCP

Conducted on December 20, 2016

63

110:1, 122:17	93:4, 94:1, 94:3, 108:13, 115:16, 130:13	siberia 119:6	single-use 15:12
seem 30:16	setting 110:13	side 61:8, 68:9, 68:12, 70:10,	sister 71:5
seemed 22:9	seven 14:19, 74:14, 78:2, 78:15	73:7, 85:3, 85:4, 85:11, 86:8, 87:7, 87:8, 87:15,	sisters 13:14
seems 81:10	several 48:1, 62:10, 75:17, 81:7, 81:18, 81:20, 81:21, 82:2, 84:21, 88:13, 89:7	91:4, 91:14, 91:17, 110:1	sit 10:4, 31:13, 83:20, 120:2
seen 34:1, 43:2, 43:20, 49:13, 50:10, 50:14, 50:15, 50:19, 51:3, 53:16, 53:17, 53:18, 65:6, 69:15, 70:14, 71:1, 108:22, 109:2, 113:3	severals 81:6	sides 90:20	site 69:2, 80:1, 80:7, 101:3, 101:4, 101:10, 101:13, 101:14, 101:16, 102:2
seize 107:10, 107:14	sex 74:20, 75:8, 112:13, 113:1, 113:12	sign 41:6, 41:9, 46:4	sitting 19:8, 23:13, 42:17, 43:13, 98:18, 99:22, 102:9, 126:16
selection 49:13, 50:19, 90:19, 93:5, 122:5, 122:15, 122:22, 126:18	shade 14:16, 15:2	signature-ils 130:18	situated 44:12, 44:14
senior 41:5, 71:21, 77:17, 77:18	share 101:13, 101:19, 122:13, 122:18, 122:21	signed 120:18	situation 25:4, 37:6, 42:17, 45:12, 45:16, 50:12, 64:1
sense 21:6, 101:13, 119:10	shared 32:1, 84:17, 102:11	signing 130:9	situations 64:16, 64:18, 68:13
separate 103:9	sharing 122:7	similar 19:15, 19:20, 22:21, 23:22, 40:7, 98:6	six 7:6, 15:6
separately 42:18, 81:2, 81:11, 120:14, 120:20	sheet 113:10	simon 3:10	skimming 48:10
series 13:15, 22:10	shore 14:11	simple 59:4, 65:22	skips 110:17, 110:19, 111:1, 111:5
served 113:6	short 21:15, 69:7, 82:13, 86:2, 103:10, 116:1, 125:20	simply 32:13, 35:14, 63:18	smattering 21:17, 21:18
services 82:17	shorthand 130:1	simultaneous 105:10, 123:11	smith 2:3, 4:4, 32:12, 32:17, 32:19
set 23:6, 24:18, 28:16, 28:19, 59:15, 79:8, 85:5, 91:5,	should 25:13, 89:15	since 7:20, 13:11, 22:18, 37:3, 53:8, 55:2, 62:6, 77:1, 80:15, 89:6, 90:19, 93:15, 113:21, 123:2, 127:3	social 37:21, 50:22, 61:6, 61:12, 61:17, 62:2, 62:13, 62:16,
shouldn't 48:11	show 74:16	single 22:22, 110:20, 110:21	
		single-family 13:20	
110:1, 122:17	93:4, 94:1, 94:3, 108:13, 115:16, 130:13	siberia 119:6	single-use 15:12
seem 30:16	setting 110:13	side 61:8, 68:9, 68:12, 70:10,	sister 71:5
seemed 22:9	seven 14:19, 74:14, 78:2, 78:15	73:7, 85:3, 85:4, 85:11, 86:8, 87:7, 87:8, 87:15,	sisters 13:14
seems 81:10	several 48:1, 62:10, 75:17, 81:7, 81:18, 81:20, 81:21, 82:2, 84:21, 88:13, 89:7	91:4, 91:14, 91:17, 110:1	sit 10:4, 31:13, 83:20, 120:2
seen 34:1, 43:2, 43:20, 49:13, 50:10, 50:14, 50:15, 50:19, 51:3, 53:16, 53:17, 53:18, 65:6, 69:15, 70:14, 71:1, 108:22, 109:2, 113:3	severals 81:6	sides 90:20	site 69:2, 80:1, 80:7, 101:3, 101:4, 101:10, 101:13, 101:14, 101:16, 102:2
seize 107:10, 107:14	sex 74:20, 75:8, 112:13, 113:1, 113:12	sign 41:6, 41:9, 46:4	sitting 19:8, 23:13, 42:17, 43:13, 98:18, 99:22, 102:9, 126:16
selection 49:13, 50:19, 90:19, 93:5, 122:5, 122:15, 122:22, 126:18	shade 14:16, 15:2	signature-ils 130:18	situated 44:12, 44:14
senior 41:5, 71:21, 77:17, 77:18	share 101:13, 101:19, 122:13, 122:18, 122:21	signed 120:18	situation 25:4, 37:6, 42:17, 45:12, 45:16, 50:12, 64:1
sense 21:6, 101:13, 119:10	shared 32:1, 84:17, 102:11	signing 130:9	situations 64:16, 64:18, 68:13
separate 103:9	sharing 122:7	similar 19:15, 19:20, 22:21, 23:22, 40:7, 98:6	six 7:6, 15:6
separately 42:18, 81:2, 81:11, 120:14, 120:20	sheet 113:10	simon 3:10	skimming 48:10
series 13:15, 22:10	shore 14:11	simple 59:4, 65:22	skips 110:17, 110:19, 111:1, 111:5
served 113:6	short 21:15, 69:7, 82:13, 86:2, 103:10, 116:1, 125:20	simply 32:13, 35:14, 63:18	smattering 21:17, 21:18
services 82:17	shorthand 130:1	since 7:20, 13:11, 22:18, 37:3, 53:8, 55:2, 62:6, 77:1, 80:15, 89:6, 90:19, 93:15, 113:21, 123:2, 127:3	smith 2:3, 4:4, 32:12, 32:17, 32:19
set 23:6, 24:18, 28:16, 28:19, 59:15, 79:8, 85:5, 91:5,	should 25:13, 89:15	single 22:22, 110:20, 110:21	social 37:21, 50:22, 61:6, 61:12, 61:17, 62:2, 62:13, 62:16,
shouldn't 48:11	show 74:16	single-family 13:20	

Transcript of George C. Caruso, CPM, RAM, SHCM, HCCP

Conducted on December 20, 2016

64

62:19, 63:6, 63:14, 64:3, 64:22, 70:19, 73:20, 75:1, 75:7, 76:20, 77:6, 77:12, 78:1, 78:5, 78:13, 79:4, 79:14, 112:21, 113:18 software 76:5, 76:16, 77:10, 79:8 solid 115:22 some 9:15, 9:16, 10:1, 12:13, 18:17, 19:3, 19:21, 21:2, 21:22, 23:20, 24:7, 24:19, 37:13, 39:8, 39:22, 43:17, 45:12, 50:5, 53:19, 55:4, 56:14, 64:16, 66:18, 69:15, 69:20, 71:1, 71:18, 75:9, 78:22, 82:15, 82:22, 84:11, 86:18, 87:3, 96:16, 104:11, 106:20, 107:11, 107:16, 108:3, 114:14, 121:6, 122:1, 127:16, 127:18, 128:17 somebody 25:18, 25:19, 30:1, 38:17, 52:17, 54:5, 55:14, 59:15, 61:3, 66:1, 68:10, 68:11, 68:14, 68:17, 80:2, 86:22,	104:17, 119:2, 119:9, 119:10 somebody's 117:11 someone 17:6, 31:5, 60:20, 61:13, 62:2, 67:1, 67:9, 71:19, 109:3, 113:15, 117:20, 119:11, 125:11 someone's 71:10 something 10:22, 11:13, 29:3, 47:20, 48:4, 48:11, 66:19, 91:21, 101:14, 113:15, 116:22, 123:12, 123:17 sometime 8:22 somewhere 14:22, 74:14, 125:11 sorry 16:21, 21:11, 51:11, 53:1, 61:14, 71:3, 83:16, 88:20, 98:8 sort 28:5, 46:22, 56:5, 56:11, 75:9, 106:18 sorts 16:5 sources 72:1, 73:16 south 15:15 southeast 14:20 southeastern 120:1 space 124:19, 126:5	spaces 21:19 speak 7:22, 80:17, 98:9, 101:8 speaking 38:4, 109:1 special 11:19, 24:18, 64:18 specialized 105:5, 105:22, 106:11, 110:5, 111:10, 112:11, 112:20 specific 23:13, 40:10, 70:1, 121:19, 122:1 specifically 24:17, 42:12, 82:5, 99:3, 121:15 specificity 17:19, 21:2 specifics 69:20 specify 22:5 speculate 100:1 speculation 27:1, 29:14, 58:11, 59:21, 63:16 spend 20:1, 21:3, 109:21, 120:7 spent 11:17, 65:11, 123:5 split 23:4 sponsor 97:8 spouse 89:20 ssi 87:3	staff 38:16, 80:7, 100:18, 101:1, 122:12 stages 22:8 stand-alone 80:16 standard 28:20, 28:21, 91:6, 127:19 standards 28:17, 28:19, 92:16, 92:18, 93:4, 93:5, 93:7, 94:3, 103:11, 115:16, 116:16 start 8:7, 74:6, 100:5, 100:9, 100:14, 106:16, 117:17 started 9:8, 14:8, 70:4, 116:18 starters 100:9 starting 69:4 starts 63:10 state 19:16, 23:16, 25:2, 26:12, 27:15, 27:22, 35:15, 42:1, 45:13, 46:8, 57:18, 57:22, 75:11, 100:12, 112:16, 112:22, 118:9 stated 86:13 statement 29:6, 65:17, 118:14, 128:21 states 1:1, 14:19,
---	--	--	---

Transcript of George C. Caruso, CPM, RAM, SHCM, HCCP

Conducted on December 20, 2016

65

27:17, 28:7, 62:14, 63:9, 63:15, 64:2, 65:2, 68:3, 72:3, 72:17, 84:9, 103:2, 118:18, 123:1, 123:22, 124:22, 128:3, 128:19 statistics 68:7, 105:1 status 25:18, 25:20, 26:6, 58:20, 62:14, 62:21, 65:19, 72:2, 72:8, 90:8, 97:22, 103:1, 108:5, 115:3, 118:9, 118:16, 118:22, 123:1, 123:21, 128:3, 128:6, 128:19, 128:20 statute 73:2, 107:13, 119:12 stay 11:15, 24:15 stay-at-home 85:20 steady 86:4 stealing 109:7 stenographically 130:7 step 71:6, 73:14 steps 73:12, 73:13, 73:14, 108:8 stick 97:7 still 15:16, 15:22, 16:13, 28:5, 28:11, 28:12,	62:3, 63:14, 65:1, 66:18, 70:18, 70:20, 72:15, 75:21, 77:17, 82:9, 87:9 stipulate 6:10 stock 18:13 stood 59:13 stop 104:1 street 3:5 strict 110:16 string 41:4 strings 19:17, 19:21, 21:4 strong 110:10 structure 43:4, 99:8 structured 47:13, 47:21, 100:15, 102:17 stubs 56:17, 56:20, 116:19 student 87:20 studied 105:1 studies 65:7 studiously 82:14, 83:4 study 61:21 stuff 10:5, 11:15, 39:18, 39:20, 39:21, 40:1, 44:18, 63:12,	66:17, 70:11, 70:12, 79:10, 116:6, 129:9 subdivision 45:13 subjected 103:10 subjects 82:22, 83:2, 83:3 submit 54:7, 88:15, 107:3 subordinates 41:9 subset 107:20 subsidies 18:7, 21:5, 26:12, 28:4 subsidized 28:19 subsidy 19:7, 23:16, 25:3, 27:21, 30:20 substantial 12:20, 14:4 substantive 123:14, 123:18, 123:20 sufficient 71:15, 86:3, 112:9 suggest 109:2, 126:19 suggesting 66:5 suit 49:2 suite 2:5, 3:13, 4:6, 75:18, 76:8 sullivan 3:4 super 76:1 supervisors 102:3	support 19:3, 115:20, 115:21 suppose 62:6 sure 17:21, 26:14, 29:11, 29:18, 34:10, 35:7, 36:3, 51:6, 52:13, 55:6, 62:6, 63:3, 65:10, 66:4, 72:8, 81:9, 82:20, 87:12, 88:12, 89:5, 90:5, 90:22, 93:14, 94:15, 96:22, 103:15, 106:16, 110:2, 114:8, 114:13, 115:22, 119:9, 119:12, 120:16, 125:21, 129:1 surprised 74:22 sustained 71:10 swear 6:6 sweep 116:6 swept 99:15, 99:17, 99:19 sworn 6:11, 6:18 system 55:6, 57:1, 59:12, 59:14, 59:15, 60:3, 61:10, 61:16, 62:8, 67:11, 80:9, 119:3 systems 59:18, 63:1, 74:12, 78:6, 80:15
---	--	---	---

Transcript of George C. Caruso, CPM, RAM, SHCM, HCCP

Conducted on December 20, 2016

66

T			
table	23:15, 24:3, 24:19, 24:21, 39:8, 53:11, 66:3, 95:12, 108:17, 113:22	terminated	73:14, 82:16, 96:13, 97:16, 99:21, 102:1, 102:5, 109:20, 109:22, 113:4, 121:6, 121:8, 121:10, 121:14
take	8:5, 13:4, 22:15, 27:10, 28:7, 30:19, 31:8, 37:5, 49:19, 52:2, 58:14, 85:10, 87:9, 87:22, 89:13, 94:21, 102:6, 114:11, 114:16, 116:19, 120:9, 122:18, 126:2	terms	18:19, 29:18, 48:5, 55:8, 91:1, 102:4, 115:19, 116:16, 121:17, 121:18, 121:19, 122:1
ten	36:21, 66:22, 120:2	tenancy	7:6, 22:4, 24:15, 25:9, 27:5, 27:10, 35:1, 39:16, 42:9, 42:14, 43:7, 49:17, 51:12, 52:12, 59:1, 62:17, 79:19, 87:9, 93:21, 94:2, 94:13, 97:18, 103:14, 104:3, 110:10, 112:5, 114:8, 115:4, 115:6, 116:2, 116:7, 116:8, 120:17, 125:5, 126:9, 126:10, 129:6, 129:12
taken	42:5, 42:7, 45:17, 49:11, 49:12, 49:13, 50:9, 50:18, 50:19, 50:21, 55:13, 56:1, 90:19, 93:5, 111:12, 116:12, 122:5, 122:15, 122:22, 124:9, 124:21, 126:18	testify	6:20, 96:4, 124:17, 126:8
takes	50:19, 50:21, 55:13, 56:1, 90:19, 93:5, 111:12, 116:12, 122:5, 122:15, 122:22, 124:9, 124:21, 126:18	tenant	6:18
taking	29:13, 78:10	tenant's	testimony
100:9, 108:7, 127:13		29:13, 78:10	6:7, 8:10, 8:16, 81:10, 97:20, 130:6
talk		tenants	
8:2, 11:19, 24:4, 82:16, 82:18, 121:7, 121:15, 121:16, 121:17, 121:19	18:10, 26:6, 27:16, 38:4, 38:10, 38:15, 76:14, 84:3, 97:22, 103:10, 103:19, 105:7, 106:12, 110:6	tenant's	114:7, 129:13
talked	47:12	theory	testimony
112:15		9:13, 9:15	6:7, 8:10, 8:16, 81:10, 97:20, 130:6
talking		thereabouts	
42:12, 42:14, 47:2, 58:18, 69:8, 71:10, 90:22, 92:20, 92:21, 93:11, 96:22, 97:18, 127:14	115:14	115:14	
target		thereafter	
32:2	47:12	130:7	
taxation		thieves	
16:4	57:4, 74:11	104:12	
taxes	21:18, 37:10, 41:8, 48:9, 55:16, 57:14, 126:3, 126:22	thing	
54:3, 54:7		27:6, 44:21, 49:4, 49:6, 55:15, 73:8, 97:19, 104:11, 127:5	
tell		things	
8:13, 23:14,	90:6, 91:22	16:5, 17:9, 41:4, 47:21, 52:22, 56:7, 58:3, 67:10, 71:20, 72:22,	

Transcript of George C. Caruso, CPM, RAM, SHCM, HCCP

Conducted on December 20, 2016

67

three-foot 20:5	8:16, 16:1, 68:16	113:15, 114:22, 116:10, 117:2, 117:3, 117:20, 118:14, 121:9, 130:5	74:10
threshold 67:15	together 96:2, 120:12, 120:13, 120:19	trusts 13:16	tysons 2:4, 4:5
through 31:13, 53:9, 59:7, 60:3, 60:4, 60:22, 67:12, 73:15, 80:4, 103:8, 127:10	told 32:12	truth 6:19, 8:14, 66:3	ultimately 37:15
throughout 73:9	took 71:9, 76:3	trw 79:18	umbrella 48:2, 48:19
throw 58:5	top 42:17, 67:22	try 8:1, 8:7, 8:8, 27:5, 63:18, 105:17, 117:17	unable 65:19, 89:17, 111:22, 118:10
tie 96:2	topics 123:3	trying 26:15, 27:7, 29:8, 68:9, 72:6, 91:7, 110:2, 112:17	unassisted 115:15
tied 106:8	touched 129:6	tuesday 1:17	unaware 25:4
tiers 47:11	tougher 69:14	tune 125:11	uncomfortable 122:7
time 7:14, 8:4, 8:5, 9:17, 10:10, 11:20, 12:4, 14:16, 20:18, 25:14, 43:15, 47:10, 54:15, 61:2, 65:11, 73:11, 77:1, 79:17, 84:16, 93:2, 104:11, 105:14, 106:4, 113:6, 115:12, 117:14, 120:6, 123:5, 123:15, 126:6, 127:12, 129:13	towards 60:6, 67:7	turnaround 59:13	under 48:19, 59:5, 81:19, 86:12, 90:18, 92:5, 95:18, 130:8
times 7:4, 7:9, 36:14, 36:21, 66:15, 96:20, 129:7	tower 15:13	turned 9:17, 68:19	underlying 99:9
title 10:3	trade 15:22, 16:6	two 10:13, 27:10, 28:13, 30:17, 35:1, 60:16, 74:4, 74:5, 82:8, 128:9	underpinned 18:14, 18:16
titles 97:17	training 11:18, 64:10, 64:17, 64:21, 84:11, 119:21	two-minute 114:12	understand 8:9, 8:20, 26:14, 27:4, 27:11, 27:13, 29:8, 30:18, 49:22, 59:1, 66:4, 72:6, 76:6, 79:22, 81:9, 82:21, 88:12, 90:5, 91:8, 94:15, 94:18, 105:4
today 6:7, 8:10,	transcript 5:10, 6:2, 130:5	type 26:21, 98:6	understanding 42:20, 50:16
	transfer 71:20, 86:18, 87:1, 87:3	types 12:7, 18:3, 28:15, 54:15, 100:2	understate 39:6
	treasury 16:2	typewriting 130:8	understated 39:2, 67:3
	treated 31:6	typically 19:9, 56:12, 56:22, 68:2, 23:11, 26:11,	understood 20:16, 63:3
	treatment 91:16		underwrite 25:18, 25:21,
	tried 129:7		
	trigger 74:4		
	trouble 60:14		
	true		

Transcript of George C. Caruso, CPM, RAM, SHCM, HCCP

Conducted on December 20, 2016

68

28:12, 72:21, 73:10, 73:13, 81:3, 81:11, 81:19, 83:6, 83:9, 121:10, 121:18	128:19 units 9:11, 13:3, 14:17, 15:1, 15:2, 15:16, 48:17, 48:18	59:14, 59:16, 73:11, 74:2, 80:15 V vacation 129:16	57:13, 61:3, 61:22, 71:10, 71:14, 72:1, 72:22, 73:13, 73:21, 116:12, 128:2, 128:19, 128:20
underwriting 27:9, 27:12, 29:2, 29:12, 30:11, 30:21, 31:1, 31:4, 31:9, 31:16, 52:13, 58:19, 58:21, 65:21, 66:20, 71:11, 72:15, 78:6, 78:11, 89:16, 90:7, 91:18, 110:16, 111:14, 118:12, 125:22, 128:7	unless 116:4 unreasonable 127:5 until 9:17, 13:11, 22:6, 22:7	variable 50:13 variance 102:2 varied 14:21 varies 112:15, 114:5 various 16:3, 99:20, 99:21, 102:5, 119:21 vary 57:5, 73:16 vast 104:9 vein 91:11 vendors 79:20 verbal 45:3, 80:22 verifiable 119:8 verification 17:1, 25:22, 27:12, 63:1, 66:16, 69:18, 78:10, 103:1, 116:14 verifications 56:18, 61:19, 74:3, 74:13 verified 56:8, 56:9, 59:7, 65:20, 118:11 verify 17:12, 26:5, 26:19, 27:16, 28:6, 56:6, 19:16, 47:4,	verifying 55:5 versus 91:4, 91:16 vet 113:19 vets 117:3, 117:5, 117:22 vetting 113:16, 115:21 vice 12:21, 14:7 videoconference 1:15 view 68:7, 102:6, 102:12, 112:6 views 27:20, 33:16 violating 119:11 violation 92:16 violent 108:19 virginia 1:2, 1:16, 2:6, 2:23, 3:14, 4:7, 39:9, 40:4, 82:2, 82:7, 108:13, 130:21 virtually 15:3, 24:21 vis-à-vis 114:1 visa 54:8, 54:11, 54:13 visas 54:12, 54:14,
underwritten 93:16			
 undocumented 16:8, 22:1, 24:8, 36:9, 40:8, 66:6, 91:21, 103:19, 105:6, 106:2, 106:12, 107:19, 108:18, 109:12, 110:6, 111:6, 112:2, 124:13	uploaded 76:10 upper 47:10 upwards 98:12 urquhart 3:4 use 21:17, 37:10, 41:8, 55:16, 57:14, 62:6, 63:1, 74:1, 74:3, 74:10, 74:12, 75:21, 76:9, 76:12, 76:15, 76:16, 81:18, 82:2, 90:19, 91:4 user 77:9 uses 12:9, 48:9, 81:21 using 19:16, 47:4,		
unemployed 84:22, 87:17, 87:19			
unfortunately 97:16			
united 1:1, 27:17, 28:7, 62:14, 63:8, 63:15, 64:2, 65:2, 68:3, 72:3, 72:17, 84:8, 103:2, 118:18, 123:1, 123:21, 124:22, 128:3,			

Transcript of George C. Caruso, CPM, RAM, SHCM, HCCP

Conducted on December 20, 2016

69

54:15, 54:21, 57:12, 65:11 visit 37:10 visited 22:11 votes 16:20	44:12, 44:13, 46:17, 46:22, 47:4, 47:11, 49:11, 50:1, 51:2, 52:11, 98:16, 99:7, 100:3 waples' 42:11, 50:8 washington 3:7, 15:6, 15:18 way 11:5, 16:11, 18:12, 19:14, 29:20, 42:10, 42:20, 44:21, 47:1, 47:17, 47:18, 47:22, 48:16, 49:6, 55:22, 57:20, 58:13, 69:6, 72:21, 73:15, 80:18, 82:5, 83:11, 93:17, 105:5, 107:19, 109:1, 110:11, 110:22, 111:9, 118:5, 124:12, 127:5, 127:10, 127:13 ways 19:15, 46:12, 72:1, 99:19, 109:5 we'll 8:4, 9:1, 21:2, 25:22, 52:2, 66:19, 94:20, 117:17, 122:8, 122:9 we're 6:4, 11:8, 38:4, 51:12, 53:9, 53:13, 53:14, 55:2, 55:4, 56:21, 57:1, 57:5,	66:19, 78:19, 87:6, 88:2, 88:13, 90:20, 90:22, 92:20, 92:21, 96:22, 97:18, 103:14, 114:15, 124:5, 126:3, 128:5, 129:8 we've 8:19, 47:1, 52:18, 52:19, 59:16, 91:5, 93:16, 96:20, 97:10, 101:22, 112:15, 115:15, 127:10 weapons 108:12, 108:14, 109:7 weeds 88:2 week 9:16 weeks 9:15, 9:16 well-managed 39:10, 39:12, 39:18, 39:20, 39:22, 40:1, 40:3 went 14:12, 15:1, 15:7, 82:12, 100:19 weren't 16:16, 17:4, 127:19 west 14:12 whatever 126:7 whenever 41:8 whereof 130:13 whereupon 6:16	whether 21:6, 21:8, 23:15, 24:6, 24:9, 24:18, 25:1, 25:7, 26:11, 26:20, 28:19, 31:10, 35:9, 35:15, 35:16, 36:5, 38:11, 44:3, 44:12, 44:17, 46:17, 46:18, 47:16, 50:4, 60:7, 60:8, 62:18, 69:7, 71:14, 72:3, 72:9, 75:5, 77:6, 77:14, 80:13, 84:7, 89:8, 98:15, 98:21, 99:15, 101:5, 103:19, 104:13, 104:18, 105:6, 106:1, 106:12, 108:18, 110:6, 110:13, 111:5, 111:11, 112:21 whole 6:19, 8:14, 12:8, 30:19, 41:4, 56:7, 67:8, 67:11, 85:4, 116:2, 122:8 whopping 15:15 wide 102:1 widely 50:13, 112:16 wife 89:17, 90:8, 90:18, 91:20, 92:2, 92:5, 92:22, 104:2 within 84:8
--	--	---	---

Transcript of George C. Caruso, CPM, RAM, SHCM, HCCP

Conducted on December 20, 2016

70

without	worked	75:18, 75:21, 76:4, 76:8, 76:9, 76:13, 77:14	35:6, 99:2 \$
14:3, 19:8, 23:13, 24:17, 41:17, 53:6, 63:13, 98:18, 99:22, 102:16, 110:7, 114:1	working	14:15, 16:1, 16:15, 18:18, 115:13	\$10,000 67:16
witness		9:17, 10:10, 25:21, 55:10,	.
35:14, 130:13		65:12, 66:1, 71:22, 86:9,	.3450
witness:		109:3, 119:11,	3:15
20:8, 21:11, 32:18, 53:2, 71:2, 71:4, 83:18, 88:21, 94:6, 95:19, 98:7, 112:5, 117:16, 129:14		120:9	.4200
wondered		56:13, 62:9, 79:12, 80:11	2:7
18:1		works	.4209
wonk		15:13, 32:15	4:8
65:10		worth	.8159
words		74:14	3:8
31:7, 57:19, 73:12		wouldn't	1
work		23:14, 42:8, 79:18, 89:20,	100
9:1, 9:15, 9:16, 11:9, 14:12, 15:7, 15:8, 15:17, 15:19, 16:7, 17:22, 18:6, 23:21, 42:11, 54:14, 55:21, 57:13, 59:8, 61:4, 61:10, 62:8, 62:14, 62:21, 63:8, 63:14, 64:2, 65:1, 65:19, 69:4, 76:1, 86:11, 97:2, 99:22, 106:6, 106:7, 116:4, 118:6, 118:10, 118:16, 118:22, 119:7, 120:11, 125:8, 126:1, 128:6	127:16		
		93:6, 93:13, 98:19, 123:14, 123:18	11
		write	3:6
		58:20, 81:5, 82:18, 83:1, 83:3, 84:1, 84:20, 85:6, 85:21, 88:14, 96:13	114
		writes	5:4
		91:17	12
		writing	1:18, 128:13
		20:12, 20:20, 20:21, 45:14	121
		written	5:3
		17:5, 20:22, 57:2, 86:12, 87:17	130
		wrong	1:21
		96:6, 126:21	131024
		x	1:20
		x	14
		1:4, 1:11	9:17, 10:9
		y	15
		yardi	11:17, 14:22, 67:8, 76:3
		75:14, 75:16,	15,000
			125:12
			16
			1:12, 1:17
			165
			13:3
			175
			13:3
			18
			81:12, 85:7, 123:5, 128:11
			19
			87:16, 93:15

Transcript of George C. Caruso, CPM, RAM, SHCM, HCCP

Conducted on December 20, 2016

71

1972 9:8 1990 16:15, 22:6, 22:7, 22:18, 23:12, 26:4, 96:21 1996 97:3, 98:16 1:cv-tse-tcb 1:12 <hr/> 2	30,000 13:3 300 14:17 31 130:17 35 129:17 37 1:18 3: 129:17	65 9:18 6th 3:5 <hr/> 7 703.641 2:7, 4:8 703.778 3:15 7057881 130:22 777 3:5 7900 2:4, 4:5 <hr/> 8 8,000 15:2 80 15:11 800 85:5 87 130:18 <hr/> 9 90 22:11, 22:12, 22:16, 65:13, 123:4 94 54:22, 93:15	
20 1:17, 67:8, 123:5 20,000 15:1 20001 3:7 2002 13:9, 13:11, 15:8, 37:3 2014 12:14 2016 1:17 2017 130:15 2018 130:17 202.538 3:8 22041 3:14 22102 2:6, 4:7 23 15:16 24 20:6 25 115:13 26 95:18 <hr/> 3 30 109:22	<hr/> 4 40 9:5, 15:8, 19:11, 23:10 40,000 125:12 4350.3 98:4, 98:12 44 9:9 45 80:1 4th 130:14 <hr/> 5 5,000 9:11 50 70:4 500 2:5, 4:6 520 3:13 55,000 14:16 563 1:12 <hr/> 6 60 18:4, 19:10, 23:9 6066 3:12		